

**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  
WILLIAMS SCOTSMAN AND WILLSCOT MOBILE MINI INC.**

This stipulation and agreed order (this “**Stipulation and Agreed Order**”) is made by and among Williams Scotsman, Inc. and WillScot Mobile Mini Inc. (together, “**Williams Scotsman**”) and Zachry Holdings, Inc. and its affiliated debtors and debtors in possession (the “**Reorganized Debtors**” and, together with Williams Scotsman, the “**Parties**” and each a “**Party**”). The Parties hereby stipulate and agree as follows:

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

**WHEREAS**, on July 16, 2024, the Reorganized Debtors filed the *Schedule of Assets and Liabilities for J.V. Industrial Companies, LLC* (Case No. 24-90396) (MI) [Docket No. 530], which scheduled a claim for Williams Scotsman (Claim No. 3329659), and the *Schedule of Assets and Liabilities for Zachry Industrial, Inc.* (Case No. 24-90385) (MI) [Docket No. 518], which also

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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 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.



scheduled a claim for Williams Scotsman (Claim No. 3333116) (collectively, the “**Scheduled Claims**”);

**WHEREAS**, on September 16, 2024, Williams Scotsman filed four proofs of claim in the Chapter 11 Cases (Claim Nos. 1520, 1544, 1546, 1554) (collectively, the “**Filed Claims**” and, together with the Scheduled Claims, the “**Claims**”);

**WHEREAS**, on November 13, 2024, the Reorganized Debtors filed the *Debtors’ Fourteenth Omnibus Objection to Certain Proofs of Claim (Reduced Claims)* [Docket No. 1406] which, among other objections, objected to two of the Filed Claims (Claim Nos. 1520, 1546) (the “**Filed Claims Objection**”);

**WHEREAS**, on November 27, 2024, the Reorganized Debtors filed the *Debtors’ Twenty-Second Omnibus Objection to Certain Scheduled Claims (Reduced Claims)* [Docket No. 1541] which, among other objections, objected to one of the Scheduled Claims (Claim No. 33329659) (the “**Scheduled Claims Objection**” and, together with the Filed Claims Objection, the “**Objections**”); and

**WHEREAS**, the Parties have reached an agreement with respect to the Claims and the Objections, 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. 1546 shall be allowed as a General Unsecured Claim<sup>2</sup> in an amount equal to \$1,143,538.32 (the “**Allowed Claim**”).

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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].

2. \$857,000 of the Allowed Claim shall be paid as a Cure Claim in full and final satisfaction of any and all prepetition Cure Claims of Willaims Scotsman.

3. The remaining Filed Claims (Claim Nos. 1520, 1544, 1554) and the Scheduled Claims (Claim Nos. 3329659, 3333116) shall be disallowed in their entirety.

4. The Filed Claims Objection as to Claim Nos. 1520 and 1546 is deemed resolved and withdrawn without prejudice.

5. The Scheduled Claims Objection as to Claim No. 3333116 is deemed resolved and withdrawn without prejudice.

6. Nothing herein alters or amends the provisions of this Court's *Order Granting Debtors' First Omnibus Motion Authorizing the Assumption and Assignment of Certain GPX Project Executory Contracts* [Docket No. 1088].

7. 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.

8. 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.

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

10. 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.

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

12. 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.

13. 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 13TH DAY OF JUNE, 2025:**

*/s/ Charles R. Koster*

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*/s/ Victor G. Solyanik*

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*Counsel to Williams Scotsman*

**Certificate of Service**

I certify that on June 13, 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