

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

In re:

Computer Simulation & Analysis, Inc.,¹

Reorganized Debtor.

)
) Chapter 11
)
) Case No. 24-90391 (MI)
)
)
)
) **Re: Docket No. 3148**

**CERTIFICATE OF NO OBJECTION TO
REORGANIZED DEBTORS' FORTIETH OMNIBUS
OBJECTION TO CERTAIN PROOFS OF CLAIM (NON-DEBTOR CLAIMS)**

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, the Reorganized Debtors hereby certify as follows:

1. On June 18, 2025, the Reorganized Debtors filed the *Fortieth Omnibus Objection to Certain Proofs of Claim (Non-Debtor Claims)* [Docket No. 3148] (the “**Fortieth Omnibus Objection**”). The Fortieth Omnibus Objection attached a proposed order (the “**Proposed Order**”).
2. On June 18, 2025, the Reorganized Debtors also filed the *Notice of Reorganized Debtors' Fortieth Omnibus Claims Objection (Non-Debtor Claims)* [Docket No. 3149].
3. The deadline for parties to file a response to the Fortieth Omnibus Objection was July 18, 2025 (the “**Response Deadline**”).

¹ The last four digits of the federal tax identification number for Computer Simulation & Analysis, Inc. are 4097. The location of the Reorganized Debtor's service address in this chapter 11 case is: P.O. Box 240130, San Antonio, Texas 78224. On June 27, 2025, the Bankruptcy Court entered the *Final Decree Closing Certain of the Chapter 11 Cases* (Case No. 24-90377 (MI), Docket No. 3178) closing the chapter 11 cases for Zachry Holdings, Inc., Zachry EPC Holdings, Inc., Zachry Engineering Corporation, ZEC New York, Inc., Zachry High Voltage Solutions, LLC, UE Properties, Inc., ZEC Michigan, Inc., Zachry Constructors, LLC, Zachry Industrial, Inc., Zachry Enterprise Solutions, LLC, Moss Point Properties, LLC, Zachry Nuclear Construction Inc., Zachry Nuclear, Inc., Zachry Nuclear Engineering, Inc., Zachry Plant Services Holdings, Inc., JVIC Fabrication, LLC, Zachry Industrial Americas, Inc., Zachry Maintenance Services, LLC, J.V. Industrial Companies, LLC, Madison Industrial Services Team, LLC (with Computer Simulation & Analysis, Inc., the “**Reorganized Debtors**”).



4. No formal responses were filed on the Court's docket prior to the Response Deadline, and the Reorganized Debtors did not receive any informal comments.

5. A revised order updating the case caption, pursuant to the *Final Decree Closing Certain of the Chapter 11 Cases* [Case No. 24-90377, Docket No. 3178], is attached hereto (the "**Revised Proposed Order**"). A redline reflecting the changes to the Proposed Order is attached hereto as **Exhibit A**. The Reorganized Debtors respectfully request entry of the Revised Proposed Order.

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Dated: July 25, 2025
Houston, Texas

/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

Bojan Guzina (admitted *pro hac vice*)
Andrew F. O'Neill (admitted *pro hac vice*)
Michael Andolina (admitted *pro hac vice*)
Fan B. He (admitted *pro hac vice*)
Adam Swingle (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
mandolina@whitecase.com
fhe@whitecase.com
adam.swingle@whitecase.com

Counsel to the Reorganized Debtors

Certificate of Service

I certify that on July 25, 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

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

In re:

Computer Simulation & Analysis, Inc.,¹

Reorganized Debtor.

)
) Chapter 11
)
) Case No. 24-90391 (MI)
)
)
) **Re: Docket No. 3148**

**ORDER SUSTAINING REORGANIZED
DEBTORS' FORTIETH OMNIBUS OBJECTION TO
CERTAIN PROOFS OF CLAIM (NON-DEBTOR CLAIMS)**

Upon the objection (the “**Objection**”)² of the Reorganized Debtors for entry of an order (this “**Order**”) disallowing the Non-Debtor Claims, identified on **Schedule 1** attached hereto, all 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 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 Reorganized Debtors, their creditors, and other parties in interest; and this Court having found support for this Objection in the Murphy Declaration; and this Court having found that the Reorganized Debtors’

¹ The last four digits of the federal tax identification number for Computer Simulation & Analysis, Inc. are 4097. The location of the Reorganized Debtor’s service address in this chapter 11 case is: P.O. Box 240130, San Antonio, Texas 78224. On June 27, 2025, the Bankruptcy Court entered the *Final Decree Closing Certain of the Chapter 11 Cases* (Case No. 24-90377 (MI), Docket No. 3178) closing the chapter 11 cases for Zachry Holdings, Inc., Zachry EPC Holdings, Inc., Zachry Engineering Corporation, ZEC New York, Inc., Zachry High Voltage Solutions, LLC, UE Properties, Inc., ZEC Michigan, Inc., Zachry Constructors, LLC, Zachry Industrial, Inc., Zachry Enterprise Solutions, LLC, Moss Point Properties, LLC, Zachry Nuclear Construction Inc., Zachry Nuclear, Inc., Zachry Nuclear Engineering, Inc., Zachry Plant Services Holdings, Inc., JVIC Fabrication, LLC, Zachry Industrial Americas, Inc., Zachry Maintenance Services, LLC, J.V. Industrial Companies, LLC, Madison Industrial Services Team, LLC (with Computer Simulation & Analysis, Inc., the “**Reorganized Debtors**”).

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

notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Objection; and this Court having determined that the legal and factual bases set forth in the Objection 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. Each Non-Debtor Claim identified on **Schedule 1** to this Order is disallowed.
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. To the extent a response is filed regarding any Non-Debtor Claim, each such Non-Debtor Claim, and the Objection as it pertains to such Non-Debtor Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Non-Debtor Claim.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order, the Objection, or the Objection Procedures shall be deemed: (a) an admission as to the validity of any prepetition claim against a Debtor or Reorganized Debtor entity; (b) a waiver of any right of any Debtor or Reorganized Debtor, or any other party in interest to dispute any prepetition claims on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in the Objection or any order granting the relief requested by the Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of any right of any Debtor or Reorganized Debtor, or any other party in interest under the Bankruptcy Code or any other applicable law.

5. The Reorganized 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 in accordance with the Objection.

6. 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.

7. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.

Dated: _____, 2025
Houston, Texas

THE HON. MARVIN P. ISGUR
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

Non-Debtor Claims

Debtors' 40th Omnibus Objection to Claims - Non-Debtor Claims

In re: Zachry Holdings, Inc., et al.
Case No. 24-90377 (MI)

Schedule 1

Claims to be Disallowed

Ref #	Name of Claimant	Proof of Claim No.	Asserted Claim Amount	Asserted Secured Claim Amount	Asserted Admin Priority Claim Amount	Asserted Priority Claim Amount	Asserted General Unsecured Claim Amount	Reason(s) for Disallowance
1	City of Houston	1796	\$13.11	\$13.11	\$0.00	\$0.00	\$0.00	Claim support identifies Zachry Construction Corporation as tax subject, which is not a debtor entity in these Chapter 11 Cases.
2	City of Houston	82	\$0.00	UNLIQUIDATED	\$0.00	\$0.00	\$0.00	Claim support identifies Zachry Construction Corporation as tax subject, which is not a debtor entity in these Chapter 11 Cases.
3	Grayson Taxing Entities (City of Sherman And Howe ISD)	268	\$54,000.00	\$54,000.00	\$0.00	\$0.00	\$0.00	Claim support identifies Zachry Construction Corporation as tax subject, which is not a debtor entity in these Chapter 11 Cases.
4	Houston Comm Coll System	1797	\$2.43	\$2.43	\$0.00	\$0.00	\$0.00	Claim support identifies Zachry Construction Corporation as tax subject, which is not a debtor entity in these Chapter 11 Cases.
5	Houston ISD	1798	\$21.93	\$21.93	\$0.00	\$0.00	\$0.00	Claim support identifies Zachry Construction Corporation as tax subject, which is not a debtor entity in these Chapter 11 Cases.
6	Houston ISD	85	\$0.00	UNLIQUIDATED	\$0.00	\$0.00	\$0.00	Claim support identifies Zachry Construction Corporation as tax subject, which is not a debtor entity in these Chapter 11 Cases.
7	Travis County	1752	\$14,875.82	\$14,875.82	\$0.00	\$0.00	\$0.00	Claim support identifies Zachry Construction Corporation as tax subject, which is not a debtor entity in these Chapter 11 Cases.

Exhibit A

Redline

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

In re:

Chapter 11

~~Chapter 11~~

~~ZACHRY HOLDINGS, INC.~~
Computer Simulation & Analysis, Inc., et al.¹

Case No. 24-90391 (MI)

~~Case No. 24-90377 (MI)~~

Reorganized ~~Debtors~~ Debtor.

Re: Docket No. 3148

~~(Jointly Administered)~~

~~Re: Docket No. ____~~

**ORDER SUSTAINING REORGANIZED
DEBTORS' FORTIETH OMNIBUS OBJECTION TO
CERTAIN PROOFS OF CLAIM (NON-DEBTOR CLAIMS)**

Upon the objection (the “**Objection**”)² of the ~~above-captioned reorganized debtors~~
~~(collectively, the “Reorganized Debtors”)~~ for entry of an order (this “**Order**”) disallowing the
Non-Debtor Claims, identified on **Schedule 1** attached hereto, all 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 this

¹ The last four digits of ~~Zachry Holdings, Inc.’s~~ the federal 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 for Computer Simulation & Analysis, Inc. are 4097.~~ The location of the Reorganized ~~Debtors’~~ Debtor’s service address in ~~these~~ this chapter 11 ~~cases~~ case is: P.O. Box 240130, San Antonio, Texas 78224.

On June 27, 2025, the Bankruptcy Court entered the Final Decree Closing Certain of the Chapter 11 Cases (Case No. 24-90377 (MI), Docket No. 3178) closing the chapter 11 cases for Zachry Holdings, Inc., Zachry EPC Holdings, Inc., Zachry Engineering Corporation, ZEC New York, Inc., Zachry High Voltage Solutions, LLC, UE Properties, Inc., ZEC Michigan, Inc., Zachry Constructors, LLC, Zachry Industrial, Inc., Zachry Enterprise Solutions, LLC, Moss Point Properties, LLC, Zachry Nuclear Construction Inc., Zachry Nuclear, Inc., Zachry Nuclear Engineering, Inc., Zachry Plant Services Holdings, Inc., JVIC Fabrication, LLC, Zachry Industrial Americas, Inc., Zachry Maintenance Services, LLC, J.V. Industrial Companies, LLC, Madison Industrial Services Team, LLC (with Computer Simulation & Analysis, Inc., the “Reorganized Debtors”).

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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 Reorganized Debtors, their creditors, and other parties in interest; and this Court having found support for this Objection in the Murphy Declaration; and this Court having found that the Reorganized Debtors' notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Objection; and this Court having determined that the legal and factual bases set forth in the Objection 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. Each Non-Debtor Claim identified on **Schedule 1** to this Order is disallowed.
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. To the extent a response is filed regarding any Non-Debtor Claim, each such Non-Debtor Claim, and the Objection as it pertains to such Non-Debtor Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Non-Debtor Claim.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order, the Objection, or the Objection Procedures shall be deemed:
 - (a) an admission as to the validity of any prepetition claim against a Debtor or Reorganized

Debtor entity; (b) a waiver of any right of any Debtor or Reorganized Debtor, or any other party in interest to dispute any prepetition claims on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in the Objection or any order granting the relief requested by the Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of any right of any Debtor or Reorganized Debtor, or any other party in interest under the Bankruptcy Code or any other applicable law.

5. The Reorganized 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 in accordance with the Objection.

6. 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.

7. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.

Dated: _____, 2025
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THE HON. MARVIN P. ISGUR
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