

**ENTERED**

July 24, 2025

Nathan Ochsner, Clerk

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

In re:	)	
	)	Chapter 11
Computer Simulation & Analysis, Inc., <sup>1</sup>	)	
	)	Case No. 24-90391 (MI)
Reorganized Debtor.	)	
	)	Re: Dkt. Nos. 1124, 1502, 2994

**STIPULATION AND AGREED ORDER REGARDING THE CLAIM  
OF TECON SERVICES, INC.**

This stipulation and agreed order (the “Stipulation and Agreed Order”) is made by and among Tecon Services, Inc. (“Tecon”) and Zachry Industrial, Inc. and its affiliates in the above-captioned proceeding (collectively, the “Debtors” or the “Reorganized Debtors” and collectively with Tecon, the “Parties”). The Parties hereby stipulate and agree as follows:

**WHEREAS** on September 16, 2024, Tecon filed a Proof of Claim [Claim No. 1540] against the Debtors (the “Claim”);

**WHEREAS** on June 3, 2025, the Reorganized Debtors filed the *Reorganized Debtors’ Objection to the Claim of Tecon Services Inc.* [Dkt. No. 2994] (the “Objection”);

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

<sup>1</sup> 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.




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

1. The Claim shall be deemed withdrawn in its entirety.
2. The Objection as to the Claim is deemed withdrawn without prejudice.
3. The Parties agree that each party shall be responsible for its respective attorneys' fees, costs, or expenses in connection with the Claim and the Objection.
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 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: July 24, 2025



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Marvin Isgur  
United States Bankruptcy Judge

**STIPULATED AND AGREED THIS 2ND DAY OF JULY, 2025:**

/s/ John B. Thomas

John B. Thomas (Attorney-in-Charge)

Texas Bar No. 19856150

S.D. Tex. ID No. 10675

jthomas@hicks-thomas.com

J. John Deis Texas

Texas Bar No. 24028289

S.D. Tex. ID No. 86963

jdeis@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 Reorganized Debtors*

/s/ Shannon S. Walla

Shannon S. Walla

Texas Bar No.

S.D. Tex. ID No.

SWalla@gallowaylawfirm.com

1301 McKinney Street, Suite 1400

Houston, TX 77010

Telephone: (713) 599-0700

Facsimile: (713)-599-0777

*Counsel for Tecon Services, Inc.*

**Certificate of Service**

I certify that on July 2, 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/ John Deis

John Deis

United States Bankruptcy Court  
Southern District of Texas

In re:  
Computer Simulation & Analysis, Inc.  
Zachry Holdings, Inc.  
Debtors

Case No. 24-90391-mi  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0541-4  
Date Rcvd: Jul 24, 2025

User: ADIuser  
Form ID: pdf002

Page 1 of 3  
Total Noticed: 24

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 26, 2025:**

Recip ID	Recipient Name and Address
db	+ Computer Simulation & Analysis, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ J.V. Industrial Companies, LLC, 3741 Red Bluff Road, Pasadena, TX 77503-3319
jdb	+ JVIC Fabrication, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Madison Industrial Services Team, LLC, 3741 Red Bluff Road, Pasadena, TX 77503-3318
jdb	+ Moss Point Properties, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ UE Properties, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ ZEC Michigan, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ ZEC New York, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Constructors, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry EPC Holdings, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Engineering Corporation, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Enterprise Solutions, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry High Voltage Solutions, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Holdings, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Industrial Americas, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Industrial, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Maintenance Services, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Nuclear Construction, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Nuclear Engineering, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Nuclear, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Plant Services Holdings, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738

TOTAL: 21

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
op	+ Email/Text: kccnoticing@kccllc.com	Jul 24 2025 20:07:00	Kurtzman Carson Consultants, LLC dba Verita Global, Kurtzman Carson Consultants, LLC dba Ver, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, UNITED STATES 90245-5614
cr	Email/Text: julie.parsons@mvalaw.com	Jul 24 2025 20:07:00	The County of Brazos, Texas, McCreary Veselka Bragg & Allen, PC, Attn: Julie Anne Parsons, PO Box 1269, Round Rock, TX 78680-1269
cr	+ Email/Text: julie.parsons@mvalaw.com	Jul 24 2025 20:07:00	The County of Medina, Texas, McCreary, Veselka, Bragg & Allen, P.C., P.O. Box 1269, Round Rock, TX 78680, UNITED STATES 78680-1269

TOTAL: 3

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
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District/off: 0541-4  
Date Rcvd: Jul 24, 2025

User: ADIuser  
Form ID: pdf002

Page 2 of 3  
Total Noticed: 24

cr Commonwealth Electric Company of the Midwest

TOTAL: 1 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

**I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jul 26, 2025

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

**The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 24, 2025 at the address(es) listed below:**

Name	Email Address
Charles R. Koster	on behalf of Joint Debtor ZEC New York Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Industrial Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Holdings Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Constructors LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Nuclear Construction Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Nuclear Engineering Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Madison Industrial Services Team LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Debtor Computer Simulation & Analysis Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Enterprise Solutions LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Moss Point Properties LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor J.V. Industrial Companies LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Nuclear Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry High Voltage Solutions LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry EPC Holdings LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor UE Properties Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Plant Services Holdings Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Industrial Americas Inc. ckoster@whitecase.com, mco@whitecase.com

District/off: 0541-4

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Page 3 of 3

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Charles R. Koster	on behalf of Joint Debtor ZEC Michigan Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Engineering Corporation ckoster@whitecase.com mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Maintenance Services LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor JVIC Fabrication LLC ckoster@whitecase.com, mco@whitecase.com
David Ryan Cordell, Jr	on behalf of Debtor Computer Simulation & Analysis Inc. rcordell@hicks-thomas.com, aguerrero@hicks-thomas.com
Evan Gershbein	on behalf of Other Prof. Kurtzman Carson Consultants LLC dba Verita Global ECFpleadings@kccllc.com, ECFpleadings@kccllc.com
John B Thomas	on behalf of Debtor Computer Simulation & Analysis Inc. jthomas@hicks-thomas.com, jmarlowe@hicks-thomas.com
John Jason Deis	on behalf of Debtor Computer Simulation & Analysis Inc. jdeis@hicks-thomas.com, lredetzke@hicks-thomas.com
Julie Anne Parsons	on behalf of Creditor The County of Brazos Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Julie Anne Parsons	on behalf of Creditor The County of Medina Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
T. Josh Judd	on behalf of Creditor Commonwealth Electric Company of the Midwest jjudd@andrewsmyers.com sray@andrewsmyers.com
US Trustee	USTPRegion07.HU.ECF@USDOJ.GOV

TOTAL: 29