

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

In re:

Computer Simulation & Analysis, Inc.,¹

Reorganized Debtor.

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) Chapter 11
)
) Case No. 24-90391 (MI)
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)
) Re: Case No. 24-90377, Dkt. Nos.
) 2175, 2215, 2218, 2246, 2252, 2255,
2257

**MOTION TO CONTINUE HEARINGS ON OBJECTIONS
TO CERTAIN PROOFS OF CLAIM SET FOR HEARING ON JULY 31, 2025
(DKT. NOS. 2175, 2215, 2218, 2246, 2252, 2255, and 2257)**

Zachry Holdings, Inc. and its affiliates in the above-captioned proceeding (collectively, the “**Reorganized Debtors**”) file this Motion to Continue Hearings on Objections to Certain Proofs of Claim Set for Hearing on July 31, 2025 (Dkt. Nos. 2175, 2215, 2218, 2246, 2252, 2255, and 2257) and respectfully show as follows.

The following Objections to Proofs of Claim are set for hearing on July 31, 2025 at 1:30 p.m. (collectively, the “**Objections**”):

- Debtors’ Objection to Proof of Claim of Austin T. Hinsley (Claim No. 1051) [Dkt. No. 2175];
- Debtors’ Objection to Proof of Claim of Ryan Chapman (Claim No. 1024) [Dkt. No. 2215];
- Debtors’ Objection to Proof of Claim of Jason J. Galvan (Claim No. 973) [Dkt. No. 2218]

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.



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- Debtors' Objection to Proof of Claim of John McDonald (Claim No. 1666) [Dkt. No. 2246].
- Debtors' Objection to Proof of Claim of Michael Wolski (Claim No. 1000) [Dkt. No. 2252];
- Debtors' Objection to Proof of Claim of Perry C. Lee (Claim No. 943) [Dkt. No. 2255]; and
- Debtors' Objection to Proof of Claim of Elmer Lee Moore (Claim No. 939) [Dkt. No. 2257].

See Case No. 24-90391, Dkt. 27 (setting hearing on Dkt. Nos. 2175, 2215, 2218); *see also* Case No. 24-90377, Dkt. 3182 (setting hearing on Dkt. No. 2246), Dkt. 3193 (setting hearing on Dkt. No. 2252), Dkt. 3183 (setting hearing on Dkt. 2255); Dkt. 3185 (setting hearing on Dkt. 2257).

The Reorganized Debtors are amending the Objections and supporting materials. The amendments include additional information regarding the Reorganized Debtors' evaluation of and basis for objecting to the proofs of claim at issue. The amendments undertaken by the Reorganized Debtors are of the same type as those ordered by the Court in the July 7, 2025 hearing pertaining to similar objections to proofs of claim. *See* Case No. 24-90377, Dkt. No. 3215 (minutes of July 7, 2025 hearing).

The amendments are in many cases substantive. Therefore, out of an abundance of caution, the Reorganized Debtors seek to provide ample notice and an opportunity for claimants to respond to the amended Objections. The Reorganized Debtors intend to provide a period of at least 30 days for claimants to respond to the amended Objections, as reflected in Local Rule 3007-001.

Accordingly, the Reorganized Debtors respectfully request that the hearing on the Objections be continued. Good cause exists for this continuance because the amended Objections will provide additional information for the benefit of the Court and the claimants, will enable a fair opportunity for claimants to respond to the amendments, and will enable a just determination of the proofs of claim at issue.

Therefore, the Reorganized Debtors respectfully request that the hearing on the Objections (Dkt. Nos. 2175, 2215, 2218, 2246, 2252, 2255, and 2257) be continued until September 8, 2025.

Respectfully submitted,

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Counsel for Reorganized Debtors

Certificate of Service

I certify that on July 29, 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/ D. Ryan Cordell, Jr.
D. Ryan Cordell, Jr.

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

In re:

Computer Simulation & Analysis, Inc.,¹

Reorganized Debtor.

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Chapter 11

Case No. 24-90391 (MI)

**ORDER GRANTING MOTION TO CONTINUE
HEARINGS ON OBJECTIONS TO CERTAIN PROOFS OF CLAIM (DKT. NOS. 2175,
2215, 2218, 2246, 2252, 2255, AND 2257)**

Upon the Motion to Continue Hearings on Objections to Certain Proofs of Claim Set for Hearing on July 31, 2025 (Dkt. Nos. 2175, 2215, 2218, 2246, 2252, 2255, and 2257) filed by the above-captioned Reorganized Debtors, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

2. The hearings on the following objections in Case No. 24-90377 are CONTINUED until September 8, 2025 at 10:00 a.m.:

- Debtors' Objection to Proof of Claim of Austin T. Hinsley (Claim No. 1051) [Dkt. No. 2175];
- Debtors' Objection to Proof of Claim of Ryan Chapman (Claim No. 1024) [Dkt. No. 2215];
- Debtors' Objection to Proof of Claim of Jason J. Galvan (Claim No. 973) [Dkt. No. 2218];
- Debtors' Objection to Proof of Claim of John McDonald (Claim No. 1666) [Dkt. No. 2246];

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- Debtors' Objection to Proof of Claim of Michael Wolski (Claim No. 1000) [Dkt. No. 2252];
- Debtors' Objection to Proof of Claim of Perry C. Lee (Claim No. 943) [Dkt. No. 2255];
and
- Debtors' Objection to Proof of Claim of Elmer Lee Moore (Claim No. 939) [Dkt. No. 2257].

3. The Reorganized Debtors must provide notice of this Order.

Dated: _____, 2025
Houston, Texas

THE HON. MARVIN P. ISGUR
UNITED STATES BANKRUPTCY JUDGE