

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

IN RE: § **CASE NO. 24-90377**
ZACHRY HOLDINGS, INC. ET AL § **CHAPTER 11**

RESPONSE TO DEBTOR'S SIXTH OMNIBUS CLAIMS OBJECTION
(CLAIMS SATISFIED PURSUANT TO GOLDEN PASS SETTLEMNT)
(This Response relates to Docket Nos. 1224)

COMES NOW Creditor TECON SERVICES, INC. ("TECON") by and through its attorney of record, and responds to Debtor's Sixth Omnibus Claims Objection (the "Objection") and shows the Court as follows:

I.
ADMISSIONS & DENIALS

1. There are no allegations in Section 1 to admit or deny, but TECON denies the that the relief Debtor seeks is appropriate.
2. TECON admits the allegations in Sections 2, 3, 4, 5, 6, and 7 of the Objection.
3. TECON has insufficient information and can neither admit nor deny the allegations in Section 9, 10, 11, 12, 13, and 14 of the Objection; accordingly, TECON denies the allegations.
4. It appears that there is nothing to object to or admit in Sections 15, 16, 17, 18, and 19 of the Objection; to the extent a response is necessary, TECON denies the allegations in Sections 15, 16, 17, 18, and 19 of the Objection.

II.
ADDITIONAL RESPONSE

5. TECON timely filed its Proof of Claim at Docket No. 75; it is based on interest Debtor owes on unpaid amounts through the Chapter 11 Petition date. Debtor needs to provide evidence in the record that TECON's Proof of Claim is covered by the Golden Pass settlement



and the procedures by which TECON is going to get its Proof of Claim paid. This alleged settlement is not clear, and with the voluminous filings in this Chapter 11 proceeding, it is unclear to what settlement Debtor actually refers. Until such time, TECON requests that the Court hold on ruling on the claim objection until Debtor provides sufficient information for Creditor to understand next steps. Otherwise, the claim is owed BY THE DEBTOR.

6. The contact information for TECON is through counsel set forth in the signature block.

III. **PRAYER**

WHEREFORE, PREMISES CONSIDERED, TECON prays that:

- (1) The Court overrule the Objection and issue an Order allowing the claim as filed;
and
- (2) TECON be awarded such other and further relief at law, and in equity, as is just.

Respectfully submitted,

//s// Branch M. Sheppard
Branch M. Sheppard
Texas Bar No. 24033057
bsheppard@gallowaylawfirm.com
Annarose M. Harding
Texas Bar No. 24071438
aharding@gallowaylawfirm.com
GALLOWAY, JOHNSON, TOMPKINS,
BURR & SMITH, A PLC
1300 McKinney Street, Suite 1400
Houston, Texas 77010
(713) 599-0700
(713) 599-0777 (fax)
ATTORNEY FOR CREDITOR,
TECON SERVICES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2024, a true and correct copy of the foregoing Response was served via the Court's CM/ECF system on all counsel and parties of record.

//s// Branch M. Sheppard
Branch M. Sheppard