

**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> ¹)	Case No. 24-90377 (MI)
)	
Reorganized Debtors.)	(Jointly Administered)
)	

**REORGANIZED DEBTORS' THIRTY-NINTH
OMNIBUS OBJECTION TO CERTAIN PROOFS OF
CLAIM AND SCHEDULED CLAIMS (REDUCED CLAIMS)**

This is an objection to your claim. This objection asks the Court to reduce the claim that you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be reduced without a hearing.

A hearing will be conducted on this matter on August 4, 2025 at 10:00 a.m. prevailing Central Time, in Courtroom 404, 4th floor, 515 Rusk Street, Houston, Texas 77002. Participation at the hearing will only be permitted by an audio and video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Isgur's conference room number is 205691. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Isgur's home page. The meeting code is "JudgeIsgur". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Isgur's home page. Select the case name, complete the required fields and click "Submit" to complete your appearance.

You should locate your name and claim on Schedule 1 or Schedule 2 to the Order attached to this

The above-captioned reorganized debtors (collectively, the "**Reorganized Debtors**" and prior to the Effective Date, the "**Debtors**")² represent as follows in support of this omnibus claims

¹ 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. The location of the Reorganized Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

² The "**Effective Date**" of the Plan (defined herein) occurred on April 10, 2025, as described in the *Notice of (I) Entry of Order Approving the Debtors' Disclosure Statement on a Final Basis and Confirming the Further*



objection (this “**Objection**”), and submit the *Declaration of William Murphy in Support of the Reorganized Debtors’ Thirty-Ninth Omnibus Objection to Certain Proofs of Claim and Scheduled Claims (Reduced Claims)* (the “**Murphy Declaration**”) attached hereto as **Exhibit A**.

Relief Requested

1. The Reorganized Debtors seek entry of an order in the form attached to this Objection (the “**Order**”) reducing each claim identified on Schedule 1 to the Order (collectively, the “**Reduced Filed Claims**”) and reducing each claim identified on Schedule 2 to the Order (collectively, the “**Reduced Scheduled Claims**,” and together with the Reduced Filed Claims, the “**Reduced Claims**”) because the Reorganized Debtors believe that the Reduced Claims (i) have been or will be partially satisfied by the Debtors or the Reorganized Debtors or a third-party and/or (ii) have overstated the liability against the Debtors’ estates.

Jurisdiction, Venue, and Predicates for Relief

2. The United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding under 28 U.S.C. § 157(b). The Reorganized Debtors confirm their consent to the entry of a final order by the Court.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The predicates for the relief requested herein are sections 105(a) and 502(b) of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”).

Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates and (II) Occurrence of the Effective Date [Docket No. 2731].

Background

5. On May 21, 2024 (the “**Petition Date**”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned chapter 11 cases. These chapter 11 cases are being jointly administered pursuant to Bankruptcy Rule 1015(b).

6. On July 16, 2024, the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs (collectively, the “**Schedules and Statements**”). *See* Docket Nos. 510-531. On August 30, 2024, December 2, 2024, December 20, 2024, and February 25, 2025 several of the Debtors filed amendments to their Schedules and Statements. *See* Docket Nos. 855-865, 1564, 1770-1775, 2401-2403.

7. On July 26, 2024, the Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, (IV) Approving Notice of Bar Dates, and (V) Granting Related Relief* [Docket No. 636] (the “**Bar Date Order**”). The Bar Date Order established September 16, 2024, at 5:00 p.m. (prevailing Central Time) as the deadline for all non-governmental entities holding or wishing to assert a “claim” (as defined in section 101(5) of the Bankruptcy Code) against any of the Debtors that arose before the Petition Date to file proof of such claim. The bar dates for filing proofs of claim related to the amended Schedules and Statements were October 4, 2024, January 2, 2025, January 21, 2025, and March 27, 2025 at 5:00 p.m. (prevailing Central Time). The deadline for all governmental entities holding or wishing to assert a claim against any of the Debtors that arose prior to the Petition Date to file proof of such claim was November 18, 2024, at 5:00 p.m. (prevailing Central Time).

8. The Reorganized Debtors are authorized to file omnibus objections to certain claims in accordance with the procedures set forth in the omnibus claims objection procedures

order [Docket No. 1209] (the “**Objection Procedures**”). To date, approximately 1,800 proofs of claim have been filed against the Debtors. The Reorganized Debtors continue to work diligently to review the proofs of claim, including any supporting documentation.

9. Between October 2024 and March 2025, the Debtors filed thirty-eight omnibus objections to various proofs of claim in accordance with the Objection Procedures. These objections were based on grounds including (i) duplicate claims, (ii) wrong debtor claims, (iii) satisfied or released claims, (iv) non-debtor claims, (v) multiple debtor claims, (vi) reclassified claims, (vii) amended claims, (viii) reduced claims, and (ix) claims with no amount asserted. The Court entered orders sustaining thirty-five of these objections.³ *See* Docket Nos. 1596-1601, 1707, 1717-1719, 1730, 1883-1887, 1892-1893, 1971, 2057-2059, 2142-2143, 2307-2310, 2551, 2554, 2656, 2850-2852, 2866, 2868-2870.

10. On February 26, 2025, the Bankruptcy Court held a combined hearing on final approval of the Disclosure Statement⁴ and confirmation of the Plan.⁵ The Court entered the order approving the Disclosure Statement and confirming the Plan on February 27, 2025.⁶ The Effective Date occurred on April 10, 2025 [Docket No. 2731].

Objection

11. Section 1111(a) of the Bankruptcy Code provides that: “[a] proof of claim or interest is deemed filed under section 501 of [title 11] for any claim or interest that appears in the

³ The Debtors withdrew three of the omnibus objections. *See* Docket Nos. 1615, 1616, 1692.

⁴ The “**Disclosure Statement**” refers to the *Disclosure Statement for the Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates* [Docket No. 1986].

⁵ The “**Plan**” refers to the *Further Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates* [Docket No. 2362].

⁶ *Findings of Fact, Conclusions of Law, and Order (I) Approving the Debtors’ Disclosure Statement on a Final Basis and (II) Confirming the Further Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates* [Docket No. 2431].

schedules filed under section 521(a)(1) or 1106(a)(2) of [title 11], except a claim or interest that is scheduled as disputed, contingent, or unliquidated.” 11 U.S.C. § 1111(a). The Bankruptcy Rules also provide that a debtor’s schedule of liabilities filed pursuant to 11 U.S.C. § 521(1) constitutes *prima facie* evidence of the validity and amount of the creditor’s claim as listed in the schedule, unless the listed claim is scheduled as “disputed, contingent, or unliquidated.” Fed. R. Bankr. P. 3003(b)(1); *see In re Prestonwood Crossing Inv., Ltd.*, 14 F.3d 53, 54 (5th Cir. 1993).

12. Section 502 of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Section 502 also provides that “if such objection to a claim is made, the court . . . shall determine the amount of such claim . . . and shall allow such claim in such amount, except to the extent that such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b).

13. Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in an omnibus objection,” which include when claims (1) are duplicative of other claims, (2) have been filed in the wrong case, (3) have been amended and superseded by subsequent claims, (4) are not timely filed, (5) have been satisfied or released during the chapter 11 case, (6) do not comply with the applicable rules and make the debtors unable to determine the validity of the claim, (7) are interests, rather than claims, and (8) assert priority in an amount exceeding the maximum amount under section 507 of the Bankruptcy Code. Fed. R. Bankr. P. 3007(d).

14. The Objection Procedures provide for additional grounds upon which the Debtors may object to claims, which include claims that (1) fail to specify the asserted claim amount (other than “unliquidated”), (2) have been satisfied by payment by a non-Debtor, (3) are incorrectly or

improperly classified, and (4) fail to specify a Debtor or are filed against multiple Debtors. Objection Procedures ¶ 1.

15. As set forth in Bankruptcy Rule 3001(f), “[a] proof of claim executed and filed in accordance with these rules shall constitute prima facie evidence of the validity and amount of the claim.” Fed. R. Bankr. P. 3001(f); *see, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of prima facie validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988).

16. Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

Reduced Claims

17. The Reorganized Debtors object to the Reduced Claims. The Reorganized Debtors thoroughly reviewed the underlying claims, any supporting documentation, and the claims register and believe that each of the Reduced Claims identified on Schedule 1 and Schedule 2 to the Order (i) have been partially satisfied by the Debtors or the Reorganized Debtors or a third-party and/or (ii) overstated the liability against the Debtors’ estates. Each row identifying the Reduced Claims on Schedule 1 and Schedule 2 to the Order notes certain facts relevant to the proposed reduction. The Reorganized Debtors have no legal obligation to pay a certain portion of each of the Reduced Claims. Failure to reduce the Reduced Claims could result in the applicable claimants receiving unwarranted recoveries against the Reorganized Debtors.

18. The Reorganized Debtors request that the Court enter an order reducing the Reduced Claims identified on Schedule 1 and Schedule 2 to the Order to the modified amounts set forth therein.

Reservation of Rights

19. This Objection is limited to the grounds stated herein. It is without prejudice to the rights of the Reorganized Debtors to object to any claim on any grounds whatsoever. The Reorganized Debtors expressly reserve all further substantive or procedural objections against the Reduced Claims. The Reorganized Debtors and Golden Pass LNG Terminal LLC reserve all rights under the global settlement approved on a final basis under the *Final Order (I) Approving the Settlement by and Among the Debtors, Golden Pass LNG Terminal LLC, CB&I LLC, Chiyoda International Corporation, and CCZJV (II) Authorizing the Parties to Perform Any and All Obligations Contemplated by the Settlement, and (III) Granting Related Relief* [Docket No. 744] and the *Stipulation of Facts and Agreed Determination of Excess Claims* (and any amendments thereto) attached as **Exhibit G** to the *Notice of Filing of the Second Plan Supplement* [Docket No. 2150-8]. Nothing contained herein or any actions taken pursuant to such relief is intended or should be construed as: (a) an admission as to the validity of any prepetition claim, including the Reduced Claims, against a Debtor or Reorganized Debtor entity; (b) a waiver of the Reorganized Debtors' right to dispute any prepetition claim, including the Reduced Claims, on any grounds; (c) a promise or requirement to pay any prepetition claim, including the Reduced Claims; (d) an implication or admission that any particular claim is of a type specified in this Objection or any order granting the relief requested by this 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 the Reorganized Debtors' rights under the Bankruptcy Code or any other applicable law.

Separate Contested Matter

20. To the extent that a response is filed regarding any Reduced Claim and the Reorganized Debtors are unable to resolve any such response, each such Reduced Claim, and the Objection as it pertains to such Reduced Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Further, the Reorganized Debtors request that any order entered by the Court regarding an objection or other reply asserted in response to this Objection be deemed a separate order with respect to each Reduced Claim.

Notice

21. The Reorganized Debtors will provide notice of this Objection to: (a) the United States Trustee for the Southern District of Texas; (b) counsel for the Prepetition Agent; (c) the United States Attorney's Office for the Southern District of Texas; (d) the state attorneys general for the states in which the Reorganized Debtors operate; (e) the Internal Revenue Service; (f) any party that has requested notice pursuant to Bankruptcy Rule 2002 and Bankruptcy Local Rule 9013-1(d); and (g) the affected claimants (and their counsel, where available). In light of the nature of the relief requested, no other or further notice need be provided.

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The Reorganized Debtors request that the Court enter the Order granting the relief requested in this Objection and such other and further relief as the Court deems appropriate under the circumstances.

Dated: June 18, 2025
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP

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Counsel to the Reorganized Debtors

Certificate of Service

I certify that on June 18, 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

Exhibit A

Murphy Declaration

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

In re:)
) Chapter 11
)
ZACHRY HOLDINGS, INC., *et al.*¹) Case No. 24-90377 (MI)
)
Reorganized Debtors.) (Jointly Administered)
)

**DECLARATION OF WILLIAM B. MURPHY IN SUPPORT OF
REORGANIZED DEBTORS' THIRTY-NINTH OMNIBUS OBJECTION TO
CERTAIN PROOFS OF CLAIM AND SCHEDULED CLAIMS (REDUCED CLAIMS)**

I, William B. Murphy, solely in my capacity as financial advisor to the above-captioned reorganized debtors (collectively, the “**Reorganized Debtors**” and prior to the Effective Date, the “**Debtors**”)², declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a Senior Director at M3 Advisory Partners, LP (“**M3**”). Inclusive of my time at M3, I have over 40 years of experience in corporate restructuring, including advising creditors and debtors on strategic planning, financial projections, claim reconciliation, claim resolution and debt restructuring. In connection with chapter 11 restructurings, I possess considerable familiarity with and experience in, among other things, analyzing and monitoring cash management systems, debt classification and priority, bankruptcy taxation, preference actions, fraudulent conveyance

¹ 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. The location of the Reorganized Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

² The “**Effective Date**” of the Plan (defined in the Objection) occurred on April 10, 2025, as described in the *Notice of (I) Entry of Order Approving the Debtors’ Disclosure Statement on a Final Basis and Confirming the Further Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates and (II) Occurrence of the Effective Date* [Docket No. 2731].

actions, feasibility issues, disclosure statement and plan of reorganization approval procedures and hearings, and negotiations between debtors and their creditors.

2. Contemporaneously with the filing of this Declaration, the Reorganized Debtors filed the *Thirty-Ninth Omnibus Objection to Certain Proofs of Claim and Scheduled Claims (Reduced Claims)* (the “**Objection**”).³

3. I am generally familiar with the Reorganized Debtors’ day-to-day operations, financing, arrangements, business affairs, and accounting software that reflects, among other things, the Debtors’ liabilities. I have read the Objection and assisted in the preparation of Schedule 1 and Schedule 2 to the Order setting forth the Reduced Claims subject to objection.

4. The facts set forth in this Declaration are based upon my personal knowledge, personal conversations I have had with the Reorganized Debtors’ management and financial advisors, or upon my review of records kept in the ordinary course of the Reorganized Debtors’ business that were, as appropriate, reviewed by me or others under my supervision and direction. Further, I or others under my supervision and direction have reviewed and analyzed, to the extent possible, the proofs of claim filed by claimants. If called and sworn as a witness, I could and would testify competently to the matters set forth herein.

5. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. I, or others under my supervision and direction, have carefully reviewed, analyzed and discussed with the Reorganized Debtors’ management and other advisors, the relevant scheduled claims and proofs of claim, as well as the supporting documentation provided by each claimant, if applicable.

³ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

Reduced Claims

6. I believe that each of the Reduced Claims on Schedule 1 and Schedule 2 to the Order was filed on account of a liability that has been partially satisfied by the Debtors, the Reorganized Debtors, or a third-party, and/or overstates the Debtors' liability. I believe that for each Reduced Claim the Debtors are liable only for the corresponding modified amount listed on Schedule 1 or Schedule 2 to the Order.

7. I, or others under my supervision and direction, have reviewed the reconciliation data and the claim register for each of the Reduced Scheduled Claims on Schedule 2 to the Order, and believe that none of the Reduced Scheduled Claims have been superseded by a later filed outstanding proof of claim.

8. The Reorganized Debtors have no legal obligation to pay a certain portion of each of the Reduced Claims. I believe that the failure to reduce the Reduced Claims could result in the applicable claimant receiving unwarranted recoveries against the Reorganized Debtors. Accordingly, I believe that the reduction of the Reduced Claims as set forth on Schedule 1 and Schedule 2 is appropriate.

Dated: June 18, 2025

By: /s/ William B. Murphy
William B. Murphy
M3 Advisory Partners, LP

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

In re:

ZACHRY HOLDINGS, INC., *et al.*¹

Reorganized Debtors.

)
) Chapter 11
)
) Case No. 24-90377 (MI)
)
) (Jointly Administered)
) **Re: Docket No. ____**

**ORDER SUSTAINING REORGANIZED DEBTORS'
THIRTY-NINTH OMNIBUS OBJECTION TO CERTAIN
PROOFS OF CLAIMS AND SCHEDULED CLAIMS (REDUCED CLAIMS)**

Upon the objection (the “**Objection**”)² of the above-captioned reorganized debtors (collectively, the “**Reorganized Debtors**”) for entry of an order (this “**Order**”) reducing the Reduced Claims, identified on **Schedule 1** and **Schedule 2** 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’ notice of the

¹ 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. The location of the Reorganized Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

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

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 Reduced Filed Claim identified on **Schedule 1** to this Order is reduced to the modified amount set forth therein.

2. Each Reduced Scheduled Claim identified on **Schedule 2** to this Order is reduced to the modified amount set forth therein.

3. 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.

4. To the extent a response is filed regarding any Reduced Claim, each such Reduced Claim, and the Objection as it pertains to such Reduced 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 Reduced Claim.

5. 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.

6. 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.

7. 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.

8. 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

Reduced Filed Claims

Debtors' 39th Omnibus Objection to Claims - Reduced Claims

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

Schedule 1														
Claims to be Corrected									Corrected Amounts					Reason for Reduction
Ref #	Name of Claimant	Filed Debtor	Claim #	Filed Claim Amount	Filed Secured Claim Amount	Filed Admin Priority Claim Amount	Filed Priority Claim Amount	Filed General Unsecured Claim Amount	Corrected Claim Amount	Corrected Secured Claim Amount	Corrected Admin Priority Claim Amount	Corrected Priority Claim Amount	Corrected General Unsecured Claim Amount	
1	Apex Systems	Zachry Holdings, Inc.	1493	\$1,526,183.65	\$0.00	\$0.00	\$0.00	\$1,526,183.65	\$848,203.65	\$0.00	\$0.00	\$0.00	\$848,203.65	\$24,393 of invoices listed in the claim have been paid as post-petition. \$614,096 of invoices listed in the claim are related to the GPX project and have been paid by Golden Pass under the GPX settlement. \$39,491 of invoices listed in the claim have been paid and released via PLNG waiver.
2	Briggs Industrial Solutions, Inc.	Zachry Industrial, Inc.	1819	\$33,528.14	\$0.00	\$0.00	\$0.00	\$33,528.14	\$27,350.00	\$0.00	\$0.00	\$0.00	\$27,350.00	\$6,178 of invoices listed in the claim are related to the GPX project and have been paid by Golden Pass under the GPX settlement
3	Canon Financial Services	Zachry Holdings, Inc.	462	\$103,959.26	\$3,410.00	\$0.00	\$0.00	\$100,549.26	\$5,141.59	\$3,410.00	\$0.00	\$0.00	\$1,731.59	\$98,818 of invoices listed in the claim have been paid by the Debtors
4	Empire Mat, Inc.	Zachry Industrial, Inc.	287	\$7,840.00	\$0.00	\$0.00	\$0.00	\$7,840.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	The invoice included in this claim has also been included in claim #481, which is being allowed
5	Higginbotham Holdings Inc	Zachry Industrial, Inc.	1176	\$10,781.12	\$0.00	\$10,781.12	\$0.00	\$0.00	\$9,959.00	\$0.00	\$9,959.00	\$0.00	\$0.00	\$822 relates to taxes that will be paid directly to the taxing authority
6	S K Power Tool Service, Inc.	Zachry Holdings, Inc.	150	\$1,751.53	\$0.00	\$0.00	\$0.00	\$1,751.53	\$1,639.00	\$0.00	\$0.00	\$0.00	\$1,639.00	\$113 of the claim relates to sales tax that will be paid by the Debtors directly to the taxing authority
7	SFP Holding INC A-1 National Fire CO LLC	Zachry Industrial Americas, Inc.	1621	\$5,002.65	\$0.00	\$0.00	\$0.00	\$5,002.65	\$322.50	\$0.00	\$0.00	\$0.00	\$322.50	\$4,680 of invoices listed in the claim have been paid as post-petition invoices (Invoices #2558235 and #2686883)
8	Staples, Inc.	Zachry Holdings, Inc.	8	\$137,603.13	\$0.00	\$0.00	\$0.00	\$137,603.13	\$17,621.58	\$0.00	\$0.00	\$0.00	\$17,621.58	\$6,749 of invoices listed in the claim have already been paid, \$6,667 of invoices listed in the claim are billed to KZJV, a non-debtor entity, \$74,807 of invoices listed in the claim are invalid and have been credited by the vendor; \$31,758 of invoices listed in the claim have been released through PLNG waiver
9	UFP Saginaw, LLC	Zachry Industrial, Inc.	902	\$122,666.40	\$0.00	\$0.00	\$0.00	\$122,666.40	\$46,847.20	\$0.00	\$0.00	\$0.00	\$46,847.20	\$75,819 of invoices listed in the claim were paid prior to the petition date
10	United Mechanical Corporation	Zachry Engineering Corporation	1764	\$3,187.04	\$0.00	\$0.00	\$0.00	\$3,187.04	\$2,494.09	\$0.00	\$0.00	\$0.00	\$2,494.09	Vendor agrees that invoices #10003047 and #10007313 were cancelled
11	W.W. Grainger	Zachry Holdings, Inc.	184	\$253,297.92	\$0.00	\$0.00	\$0.00	\$253,297.92	\$166,428.08	\$0.00	\$0.00	\$0.00	\$166,428.08	\$2,935 of invoices listed in the claim were paid as post-petition invoices. \$31,569 of invoices listed in the claim were related to GPX and paid by Golden Pass pursuant to the GPX settlement. \$1,475 of invoices were paid prior to the petition date. \$19,859 of invoices were KZJV obligations and paid by KZJV during the course of the cases. \$317 of amounts listed in the claim relate to sales tax that will be paid directly by the debtors to the taxing authority. \$30,714 of invoices listed in the claim are KZJV obligations.

Schedule 2

Reduced Scheduled Claims

Debtors' 39th Omnibus Objection to Claims - Reduced Claims

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

Schedule 2														
Claims to be Corrected									Corrected Amounts					Reason for Reduction
Ref #	Name of Claimant	Filed Debtor	Schedule ID	Filed Claim Amount	Filed Secured Claim Amount	Filed Admin Priority Claim Amount	Filed Priority Claim Amount	Filed General Unsecured Claim Amount	Corrected Claim Amount	Corrected Secured Claim Amount	Corrected Admin Priority Claim Amount	Corrected Priority Claim Amount	Corrected General Unsecured Claim Amount	
1	Mesa Associates Inc	Zachry Nuclear Engineering, Inc.	3333459	\$70,087.50	\$0.00	\$0.00	\$0.00	\$70,087.50	\$41,850.00	\$0.00	\$0.00	\$0.00	\$41,850.00	\$28,238 of invoices listed in the claim have been voided by the vendor