

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)
)

NOTICE OF REORGANIZED DEBTORS' FORTIETH
OMNIBUS CLAIMS OBJECTION (NON-DEBTOR CLAIMS)

This is an objection to your claim. This objection asks the Court to disallow the claim that you filed in this bankruptcy case. You should immediately contact the Reorganized Debtors to resolve the dispute. If you do not reach an agreement, you must file a response to this objection and send a copy of your response to the Reorganized Debtors within 30 days after the objection was served on you. Your response must state why the objection is not valid. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Important Information Regarding the Objection

Grounds for the Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to disallow your claim(s) on the grounds that your claim(s) is against a non-Debtor entity, not against the Debtors. The claim(s) subject to the Omnibus Objection may be found on the schedule attached to the Omnibus Objection, a copy of which has been provided with this notice.

Objection Procedures. On October 24, 2024, the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) entered an order [Docket No. 1209] approving procedures for filing and resolving objections to claims asserted against the Debtors in these chapter 11 cases (the “**Objection Procedures**”).

Resolving the Objection

Parties Required to File a Response. If you disagree with the Omnibus Objection filed with respect to your claim, you must file a response (each, a “**Response**”) with the Court in accordance with the procedures described below and appear at the Hearing (as defined herein).

Response Contents. Each Response must contain the following (at a minimum):

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.



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- a) a caption stating the name of the Court, the name of the Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- b) the reasons why the Court should not grant the objection with respect to such claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection, and may also include a copy of any other documentation or other evidence of the claim, to the extent not already included with the claim, upon which the claimant will rely in opposing the objection; *provided*, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; *provided, further*, that the claimant shall disclose to counsel to the Debtors or the Reorganized Debtors, as applicable, all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints; and
- c) the following contact information of the responding party:
 - i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Debtors or the Reorganized Debtors, as applicable, should serve a reply to the Response, if any; or
 - ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant's behalf.

Notice and Service. Your Response must be filed with the Court and served so as to be ***actually received*** by 4:00 p.m. (prevailing Central Time) on July 18, 2025 (the “**Response Deadline**”).

Failure to Respond. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Debtors or the Reorganized Debtors, as applicable, resolving the objection to a claim (as described in the Objection Notice), failure to timely file and serve a Response as set forth herein or to appear at the Hearing may affect your rights and may result in the Court granting the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing on the Objection

Date, Time, and Location. A hearing (the “**Hearing**”) on the Omnibus Objection will be held on August 4, 2025, at 10:00 a.m. prevailing Central Time, before the Honorable Marvin Isgur, United States Bankruptcy Judge, in Courtroom 404, 515 Rusk, Houston, Texas 77002. The Hearing may be adjourned to a subsequent date in these chapter 11 cases by the Debtors or the Reorganized Debtors, as applicable, with the consent of the affected claimant(s). Any other continuance may be sought by any party to an Omnibus Objection, solely as it pertains to such

party, by motion. **You must attend the Hearing if you disagree with the Omnibus Objection and have filed a Response.** The initial setting on a contested claim for which (a) a Response is filed in accordance with the procedures herein but such Response is not resolved prior to the Hearing such that the affected claimant does not oppose the Omnibus Objection, and (b) an appearance is made at the Hearing, may be heard at the Hearing or treated as a status conference provided with the consent of the affected parties. If a subsequent hearing is determined to be necessary, the Debtors or the Reorganized Debtors, as applicable, shall file with the Court and serve on the affected claimants a notice of the subsequent hearing (the date of which shall be determined in consultation with the affected claimant(s)) or announce such adjournment on the record.

Discovery. If the Debtors, the Reorganized Debtors, or any affected claimant determines that discovery is necessary in advance of a Hearing on an Omnibus Objection, such party shall serve notice on the Debtors, the Reorganized Debtors, or affected claimant, as applicable, and its counsel of record that the scheduled Hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Such notice may be incorporated into the initial agenda for the Hearing or may be provided by separate notice.

Additional Information

Additional Information. Copies of these procedures, the Motion, the Order, or any other pleadings (the “**Pleadings**”) filed in these chapter 11 cases are available at no cost at the Debtors’ Claims and Noticing Agent’s website <https://www.veritaglobal.net/zhi>. You may also obtain copies of the Pleadings for a fee at the Court’s website at <https://ecf.txsb.uscourts.gov/>. A login identification and password to the Court’s Public Access to Court Electronic Records (“**PACER**”) are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.uscourts.gov>.

Reservation of Rights. **Nothing in any Omnibus Objection or Objection Notice is intended or shall be deemed to constitute (a) an admission as to the validity of any prepetition claim against a Debtor entity; (b) a waiver of any right of any Debtor, the Reorganized Debtors, or any other party in interest to dispute any prepetition claim 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 an Omnibus Objection or this Order; (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, the Reorganized Debtors, or any other party in interest under the Bankruptcy Code or any other applicable law.**

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Dated: June 18, 2025
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP

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