

**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> <sup>1</sup>	)	
	)	Case No. 24-90377 (MI)
Debtors.	)	(Jointly Administered)
	)	Re: Dkt. Nos. 2215, 2218

**MOTION TO CONTINUE HEARING ON OBJECTIONS  
TO CERTAIN PROOFS OF CLAIM (DKT. NOS. 2215, 2218)**

Zachry Holdings, Inc. and its affiliates in the above-captioned proceeding (collectively, the “**Reorganized Debtors**”) file this Motion to Continue Hearing on Objections to Certain Proofs of Claim and respectfully show as follows.

On February 17, 2025, the Reorganized Debtors filed *Debtors’ Objection to Proof of Claim of Ryan D. Chapman (Claim No. 1024)*, and *Debtors’ Objection to Proof of Claim of Jason J. Galvan (Claim No. 973)* (the “**Objections**”). Dkt. Nos. 2215, 2218.

The Objections asked the Court to disallow Proofs of Claim Nos. 973 and 1024 because those claims were for employment-related benefits that were unrecoverable under the Reorganized Debtors’ relevant employment policies.

Mr. Oscar Coronado (the “**Declarant**”) executed a declaration in support of each of the Objections. Declarant Coronado is the Director of Employee Connections, Employee Assistance and Dispute Resolution at Zachry Enterprise Solutions, LLC, which is among the Reorganized Debtors. Declarant Coronado has extensive experience and familiarity with the Reorganized

---

<sup>1</sup> The last four digits of Zachry Holdings, Inc.’s tax identification number are 6814. A complete list of each of the 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 Debtors’ claims and noticing agent at [www.veritaglobal.net/ZHI](http://www.veritaglobal.net/ZHI). The location of the Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.



Debtors' employment policies, and reviewed the proofs of claim, records, and policies relevant to the Objections.

On June 12, 2025, the Court set the Objections for a hearing on July 7, 2025 at 1:30 p.m. Dkt. Nos. 3044, 3045.

Unfortunately, Declarant Coronado is unable to appear for the hearing on July 7, 2025 at 1:30 p.m.

The Reorganized Debtors desire to have Declarant Coronado available to testify regarding the Objections, if necessary, for the benefit of the Court and all parties.

Therefore, the Reorganized Debtors respectfully request that the hearing on the Objections (Dkt. Nos. 2215, 2218) be continued to a later date so that Declarant Coronado may appear.

Respectfully submitted,

/s/ D. Ryan Cordell, Jr.  
John B. Thomas (Attorney-in-Charge)  
Texas Bar No. 19856150  
S.D. Tex. ID No. 10675  
jthomas@hicks-thomas.com  
D. Ryan Cordell, Jr.  
Texas Bar No. 24109754  
S.D. Tex. ID No. 3455818  
rcordell@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*

**Certificate of Service**

I certify that on June 23, 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.

