

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

---

In re:

Computer Simulation & Analysis, Inc.,<sup>1</sup>

Reorganized Debtor.

---

)  
)  
)  
)  
)  
)  
)

Chapter 11

Case No. 24-90391 (MI)

---

**STIPULATION AND AGREED ORDER REGARDING THE  
CLAIMS OF CONSOLIDATED PIPE AND SUPPLY COMPANY**

---

This stipulation and agreed order (this “**Stipulation and Agreed Order**”) is made by and among Consolidated Pipe and Supply Company, Inc., d/b/a High Country Fusion (“**Consolidated Pipe**”) and Zachry Holdings, Inc. and its affiliated reorganized debtors (the “**Reorganized Debtors**” and, together with Consolidated Pipe, the “**Parties**” and each a “**Party**”). The Parties hereby stipulate and agree as follows:

**WHEREAS**, on May 21, 2024, the Reorganized Debtors commenced these chapter 11 cases (the “**Chapter 11 Cases**”) in the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”);

**WHEREAS**, on September 16, 2024, and October 11, 2024, Consolidated Pipe filed proofs of claim in the Chapter 11 Cases (Claim Nos. 1478 and 1649) (the “**Claims**”);

---

<sup>1</sup> 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.



24903912507010000000000001

**WHEREAS**, on November 13, 2024, the Reorganized Debtors filed the *Debtors' Thirteenth Omnibus Objection to Certain Proofs of Claim (Satisfied Claims)* [Docket No. 1404] which, among other objections, objected to one of the Claims (Claim No. 1478) (the “**Claim Objection**”); and

**WHEREAS**, the Parties have reached an agreement with respect to the Claims and the Claim Objection, and have agreed to the treatment of the Claims on the terms and conditions set forth in this Stipulation and Agreed Order.

**NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND ORDERED:**

1. The Claims (Claim Nos. 1478 and 1649) shall be disallowed in their entirety.
2. The Claim Objection as to Claim No 1478 is deemed resolved and withdrawn without prejudice.
3. Kurtzman Carson Consultants, LLC (dba 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 Stipulation and Agreed Order.
4. This Stipulation and Agreed Order is subject to the approval of the Court and shall be of no force and effect unless it is approved by the Court.
5. The terms and conditions of this Stipulation and Agreed Order shall be immediately effective and enforceable upon entry by the Court.
6. This Stipulation and Agreed Order may be signed in counterparts and signatures may be delivered by fax or email, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument. Each of the undersigned counsel that executes this Stipulation and Agreed Order by or on behalf of each respective Party represents and

warrants that such undersigned counsel has been duly authorized and empowered to execute and deliver this Stipulation and Agreed Order on behalf of such Party.

7. Each Party represents and warrants that it is duly authorized to enter into and be bound by this Stipulation and Agreed Order.

8. This Stipulation and Agreed Order constitutes the entire agreement between the Parties with respect to the subject matter hereof and shall not be modified, altered, amended, or vacated without the prior written consent of all Parties hereto or by order of the Court.

9. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation and Agreed Order.

Signed: \_\_\_\_\_, 2025

---

THE HON. MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

**STIPULATED AND AGREED THIS 1ST DAY OF JULY, 2025:**

/s/ Charles R. Koster

**WHITE & CASE LLP**

Charles R. Koster (Texas Bar No. 24128278)  
609 Main Street, Suite 2900  
Houston, Texas 77002  
Telephone: (713) 496-9700  
Facsimile: (713) 496-9701  
Email: charles.koster@whitecase.com

-and-

**WHITE & CASE LLP**

Bojan Guzina (admitted *pro hac vice*)  
Andrew F. O'Neill (admitted *pro hac vice*)  
Fan B. He (admitted *pro hac vice*)  
Adam T. Swingle (admitted *pro hac vice*)  
111 South Wacker Drive, Suite 5100  
Chicago, Illinois 60606  
Telephone: (312) 881-5400  
Email: bojan.guzina@whitecase.com  
aoneill@whitecase.com  
fhe@whitecase.com  
adam.swingle@whitecase.com

*Counsel to the Reorganized Debtors*

/s/ Wes Bulgarella

Wes Bulgarella

1901 Sixth Ave N, Suite 1700  
Birmingham, AL 35203  
Telephone: (205) 254-1875  
Email: wbulgarella@MaynardNexsen.com

*Counsel to Consolidated Pipe*

**Certificate of Service**

I certify that on July 1, 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