

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

In re:	)	Chapter 11
Computer Simulation & Analysis, Inc., <sup>1</sup>	)	Case No. 24-90391 (MI)
Reorganized Debtor.	)	Re: Dkt. Nos. 1124, 1502, 2994

**STIPULATION AND AGREED ORDER REGARDING THE CLAIM  
OF TECON SERVICES, INC.**

This stipulation and agreed order (the “Stipulation and Agreed Order”) is made by and among Tecon Services, Inc. (“Tecon”) and Zachry Industrial, Inc. and its affiliates in the above-captioned proceeding (collectively, the “Debtors” or the “Reorganized Debtors” and collectively with Tecon, the “Parties”). The Parties hereby stipulate and agree as follows:

**WHEREAS** on September 16, 2024, Tecon filed a Proof of Claim [Claim No. 1540] against the Debtors (the “Claim”);

**WHEREAS** on June 3, 2025, the Reorganized Debtors filed the *Reorganized Debtors’ Objection to the Claim of Tecon Services Inc.* [Dkt. No. 2994] (the “Objection”);

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

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<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.



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

1. The Claim shall be deemed withdrawn in its entirety.
2. The Objection as to the Claim is deemed withdrawn without prejudice.
3. The Parties agree that each party shall be responsible for its respective attorneys' fees, costs, or expenses in connection with the Claim and the Objection.
4. 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.
5. 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.
6. The terms and conditions of this Stipulation and Agreed Order shall be immediately effective and enforceable upon entry by the Court.
7. 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.
8. Each Party represents and warrants that it is duly authorized to enter into and be bound by this Stipulation and Agreed Order.
9. 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.

10. 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: \_\_\_\_\_

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Marvin Isgur  
United States Bankruptcy Judge

**STIPULATED AND AGREED THIS 2ND DAY OF JULY, 2025:**

/s/ John B. Thomas

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*Counsel for Tecon Services, Inc.*

**Certificate of Service**

I certify that on July 2, 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/ John Deis

John Deis