

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

In re:

Computer Simulation & Analysis, Inc.,¹

Reorganized Debtor.

)

)

)

)

)

)

)

Chapter 11

Case No. 24-90391 (MI)

Re: Case No. 24:90377, Dkt. No. 2175

**MOTION TO CONTINUE HEARING ON OBJECTION
TO PROOF OF CLAIM NO. 1051 (DKT. NO. 2175)**

Zachry Holdings, Inc. and its affiliates in the above-captioned proceeding (collectively, the “**Reorganized Debtors**”) file this Motion to Continue Hearing on Objection to Proof of Claim No. 1051 and respectfully show as follows.

On February 14, 2025, the Reorganized Debtors filed *Debtors’ Objection to Proof of Claim No. 1051* (the “**Objection**”). Dkt. No. 2175.

The Objection asked the Court to disallow Proof of Claim No. 1051 because that claim was for alleged amounts that were unrecoverable under the Reorganized Debtors’ relevant employment policies.

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

¹ 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.



Declarant Coronado has extensive experience and familiarity with the Reorganized Debtors' employment policies, and reviewed the proofs of claim, records, and policies relevant to the Objection.

On June 26, 2025, the Court set the Objection for a hearing on July 7, 2025 at 1:30 p.m. See Docket Text Entry "*Hearing Set On (Related document(s):[2175] Objection to Claim, [2250] Objection to Claim, [2267] Objection to Claim, [2272] Objection to Claim, [2276] Objection to Claim) Hearing scheduled for 7/7/2025 at 01:30 PM at Houston, Courtroom 404 (MI). (acj4).*"

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 Objection, if necessary, for the benefit of the Court and all parties.

The Reorganized Debtors previously moved to continue hearings on two other objections (Dkt. Nos. 2215 and 2218) for which Declarant Coronado was declarant, which were also previously set for July 7, 2025. See Dkt. No. 3165. The Court granted that motion, re-setting those objections for hearing on July 15, 2025, when Declarant Coronado was available. See Docket Text Entry "*Hearing Continued by Request (Related document(s):[2215] Objection to Claim, [2218] Objection to Claim, [3165] Motion to Continue/Reschedule Hearing) Contacted by David Cordell. Movant to notice all interested parties and file a certificate of service with the court. Hearing scheduled for 7/15/2025 at 02:00 PM at Houston, Courtroom 404 (MI). (SierraThomasAnderson).*"

Therefore, the Reorganized Debtors respectfully request that the hearing on the Objection (Dkt. Nos. 2175) be continued to a later date so that Declarant Coronado may appear. For

convenience and efficiency, the Reorganized Debtors respectfully request that the hearing on the Objection be continued to July 15, 2025, at 2:00 P.M.

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 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/ D. Ryan Cordell, Jr.
D. Ryan Cordell, Jr.

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

In re:

Computer Simulation & Analysis, Inc.,¹

Reorganized Debtor.

)
)
)
)
)
)
)

Chapter 11

Case No. 24-90391 (MI)

**ORDER GRANTING MOTION TO CONTINUE HEARING ON OBJECTION
TO PROOF OF CLAIM NO. 1051 (DKT. NO. 2175)**

Upon the Motion to Continue Hearing on Objection to Proof of Claim No. 1051 (Dkt. No. 2175) filed by the above-captioned Reorganized Debtors, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The hearing on *Debtors' Objection to Proof of Claim No. 1051* (Dkt. No. 2175) is CONTINUED, and re-set for **July 15, 2025 at 2:00 P.M. (CST)**.
3. The Reorganized Debtors must provide notice to the claimants.

Dated: _____, 2025
Houston, Texas

THE HON. MARVIN P. ISGUR
UNITED STATES BANKRUPTCY JUDGE

¹ 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.