

**ENTERED**

September 02, 2025

Nathan Ochsner, Clerk

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

<b>In re:</b>	§	CASE NO. 24-90391 (MI)
	§	
Computer Simulation & Analysis, Inc <sup>1</sup> ,	§	CHAPTER 11
	§	
REORGANIZED DEBTOR.	§	
	§	

**STIPULATION AND ORDER ABATING OBJECTION TO CLAIM OF  
COMMONWEALTH ELECTRIC COMPANY OF THE MIDWEST**

[Relates to Docket 2336 & 3166]

This stipulation and agreed order (this “Stipulation and Order”) is made by and among Commonwealth Electric Company of the Midwest (“CECM”) and Zachry Holdings, Inc. and its affiliated reorganized debtors (the “Reorganized Debtors”) (together, CECM and the Reorganized Debtors are referred to as the “Parties,” and each a “Party”). The Parties hereby stipulate and agree as follows:

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

WHEREAS, on August 27, 2024, CECM filed proof of claim no. 1003 in bankruptcy case 24-90385 for Zachry Industrial, Inc. for \$5,359,030.62 (the “CECM Bankruptcy Claim”);

WHEREAS, on February 20, 2025, the Reorganized Debtors filed an Objection to the CECM Bankruptcy Claim [Doc. 2336] (“the Claim Objection”);

WHEREAS, on May 23, 2025, CECM filed the Motion for Summary Judgment with Respect to Debtors’ Objection to the Claim of Commonwealth Electric Company of the Midwest [Doc. 2953] (the “Summary Judgment Motion”);

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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), Doc3178) 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.



WHEREAS, on June 23, 2025, the Court entered the *Stipulation and Order Regarding the Claim Objection* [Doc. 3166] (the “**Stipulation**”) that, among other things, set trial on the Claim Objection to begin on October 14, 2025;

WHEREAS, on July 15, 2025, the United States District Court for the District of Nebraska entered an order (the “**Stay Order**”) staying the dispute commenced by CECM against Zachry’s sureties under Case No. 4:24CV3149, *Commonwealth Electric Company of the Midwest, a Nebraska Corporation v. Travelers Casualty and Surety Company of America, a Corporation*; and *Pacific Indemnity Company, a Delaware Corporation* (the “**CECM Nebraska Action**”);

WHEREAS, the Parties have engaged in discovery but have not yet conducted depositions;

WHEREAS, the Parties have agreed to abate further discovery and related deadlines, including scheduling depositions, and adjourn the trial on the Claim Objection in order to participate in mediation relating to the CECM Bankruptcy Claim as provided herein;

WHEREAS, CECM has agreed it will not attempt to remove the Stay Order or otherwise attempt to revive the CECM Nebraska Action or take any other action against Zachry’s sureties until the Parties have participated in mediation on the CECM Bankruptcy Claim as provided herein.

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

1. The discovery deadlines relating to the Claim Objection are abated pending the Parties participating in mediation with a mutually acceptable mediator, with a mediation to be held by September 20, 2025 or the mediator’s next available date. In no event shall the mediation occur later than October 14, 2025, absent a further written agreement of the Parties or order of the Court. If the Parties have not participated in a mediation session by such date, the abatement of discovery deadlines shall automatically terminate, and the litigation shall resume in accordance with a revised case schedule to be agreed upon by the Parties or set by the Court at the next status conference.

2. The trial on the Claim Objection is adjourned indefinitely, and the October 14, 2025 trial date shall be reset as a status conference.

3. The Parties shall not schedule a hearing on the Summary Judgment Motion until the conclusion of the mediation.

4. CECM shall not take any action to terminate the Stay Order, or otherwise attempt to revive the CECM Nebraska Action or take any other action against Zachry’s sureties, until the conclusion of the mediation.

5. The Court <sup>retains</sup> shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation and Order.

Signed: September 02, 2025

112722981

  
Marvin Isgur  
United States Bankruptcy Judge

SO STIPULATED:

HICKS THOMAS LLP

/s/ John J. Deis

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S.D. Tex. ID No. 10675  
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John J. Deis (Texas Bar No. 24028289)  
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Telephone: (713) 547-9100  
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&

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Laura J. Garr (admitted pro hac vice)

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**COUNSEL FOR THE REORGANIZED  
DEBTORS**

ANDREWS MYERS P.C.

/s/ T. Josh Judd

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Fax: 713-850-4211  
[jjudd@andrewsmyers.com](mailto:jjudd@andrewsmyers.com)  
*Local Counsel for CECM*

&

WOODS AITKEN LLP

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[asvane@woodsaitken.com](mailto:asvane@woodsaitken.com)

**LEAD COUNSEL FOR CECM**

United States Bankruptcy Court  
Southern District of Texas

In re:  
Computer Simulation & Analysis, Inc.  
Zachry Holdings, Inc.  
Debtors

Case No. 24-90391-mi  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0541-4  
Date Rcvd: Sep 02, 2025

User: ADIuser  
Form ID: pdf002

Page 1 of 3  
Total Noticed: 24

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 04, 2025:**

Recip ID	Recipient Name and Address
db	+ Computer Simulation & Analysis, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ J.V. Industrial Companies, LLC, 3741 Red Bluff Road, Pasadena, TX 77503-3319
jdb	+ JVIC Fabrication, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Madison Industrial Services Team, LLC, 3741 Red Bluff Road, Pasadena, TX 77503-3318
jdb	+ Moss Point Properties, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ UE Properties, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ ZEC Michigan, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ ZEC New York, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Constructors, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry EPC Holdings, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Engineering Corporation, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Enterprise Solutions, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry High Voltage Solutions, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Holdings, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Industrial Americas, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Industrial, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Maintenance Services, LLC, 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Nuclear Construction, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Nuclear Engineering, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Nuclear, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738
jdb	+ Zachry Plant Services Holdings, Inc., 527 Logwood Avenue, San Antonio, TX 78221-1738

TOTAL: 21

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
op	+ Email/Text: kccnoticing@kccllc.com	Sep 02 2025 21:41:00	Kurtzman Carson Consultants, LLC dba Verita Global, Kurtzman Carson Consultants, LLC dba Ver, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, UNITED STATES 90245-5614
cr	Email/Text: julie.parsons@mvalaw.com	Sep 02 2025 21:41:00	The County of Brazos, Texas, McCreary Veselka Bragg & Allen, PC, Attn: Julie Anne Parsons, PO Box 1269, Round Rock, TX 78680-1269
cr	+ Email/Text: julie.parsons@mvalaw.com	Sep 02 2025 21:41:00	The County of Medina, Texas, McCreary, Veselka, Bragg & Allen, P.C., P.O. Box 1269, Round Rock, TX 78680, UNITED STATES 78680-1269

TOTAL: 3

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
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District/off: 0541-4  
Date Rcvd: Sep 02, 2025

User: ADIuser  
Form ID: pdf002

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Total Noticed: 24

cr Commonwealth Electric Company of the Midwest

TOTAL: 1 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

**I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Sep 04, 2025

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

**The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 2, 2025 at the address(es) listed below:**

Name	Email Address
Charles R. Koster	on behalf of Joint Debtor ZEC New York Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Industrial Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Holdings Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Constructors LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Nuclear Construction Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Nuclear Engineering Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Madison Industrial Services Team LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Debtor Computer Simulation & Analysis Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Enterprise Solutions LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Moss Point Properties LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor J.V. Industrial Companies LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Nuclear Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry High Voltage Solutions LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry EPC Holdings LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor UE Properties Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Plant Services Holdings Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	

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Total Noticed: 24

	on behalf of Joint Debtor Zachry Industrial Americas Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor ZEC Michigan Inc. ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Engineering Corporation ckoster@whitecase.com mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor Zachry Maintenance Services LLC ckoster@whitecase.com, mco@whitecase.com
Charles R. Koster	on behalf of Joint Debtor JVIC Fabrication LLC ckoster@whitecase.com, mco@whitecase.com
David Ryan Cordell, Jr	on behalf of Debtor Computer Simulation & Analysis Inc. rcordell@hicks-thomas.com, aguerrero@hicks-thomas.com
David Ryan Cordell, Jr	on behalf of Joint Debtor Zachry Holdings Inc. rcordell@hicks-thomas.com, aguerrero@hicks-thomas.com
Evan Gershbein	on behalf of Other Prof. Kurtzman Carson Consultants LLC dba Verita Global ECFpleadings@kccllc.com, ECFpleadings@kccllc.com
John B Thomas	on behalf of Debtor Computer Simulation & Analysis Inc. jthomas@hicks-thomas.com, jmarlowe@hicks-thomas.com
John Jason Deis	on behalf of Debtor Computer Simulation & Analysis Inc. jdeis@hicks-thomas.com, lredetzke@hicks-thomas.com
Julie Anne Parsons	on behalf of Creditor The County of Brazos Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Julie Anne Parsons	on behalf of Creditor The County of Medina Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
T. Josh Judd	on behalf of Creditor Commonwealth Electric Company of the Midwest jjudd@andrewsmyers.com sray@andrewsmyers.com
US Trustee	USTPRegion07.HU.ECF@USDOJ.GOV
TOTAL: 30	