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

| | | |
|---|---|---|
| In re: | ) | Chapter 11 |
| ZACHRY HOLDINGS, INC., *et al.*[1] | ) | Case No. 24-90377 (MI) |
| Debtors. | ) | (Jointly Administered) |

**NOTICE OF FILING OF REDLINE OF MODIFIED DISCLOSURE STATEMENT FOR THE MODIFIED FIRST AMENDED PLAN OF REORGANIZATION**

**PLEASE TAKE NOTICE** that, on January 22, 2025, the above-captioned debtors and debtors in possession (collectively, the "**Debtors**") filed the *Disclosure Statement for the Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates* (the "**Disclosure Statement**") [Docket No. 1979].

**PLEASE TAKE FURTHER NOTICE** that on January 23, 2025, the Debtors modified the Disclosure Statement per the Court's direction [Docket No. 1986] (the "**Further Modified Disclosure Statement**").

**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit A** is a changed pages redline of the Modified Disclosure Statement marked against the Further Modified Disclosure Statement.

*[Remainder of Page Intentionally Left Blank]*

[1] 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. The location of the Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

24903772501230000000000008

Dated: January 23, 2025
Houston, Texas

*/s/ Charles R. Koster*

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*Debtors in Possession*

**Certificate of Service**

I certify that on January 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/ Charles R. Koster*
Charles R. Koster

# Exhibit A

## Changed Pages Redline – Disclosure Statement

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

| | | |
|---|---|---|
| In re: | ) | Chapter 11 |
| ZACHRY HOLDINGS, INC., *et al.*[1] | ) | Case No. 24-90377 (MI) |
| Debtors. | ) | (Jointly Administered) |

**DISCLOSURE STATEMENT FOR THE MODIFIED FIRST AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF ZACHRY HOLDINGS, INC. AND ITS DEBTOR AFFILIATES**

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*Counsel to the Debtors and Debtors in Possession*

Dated: January ~~22~~23, 2025
Houston, Texas

[1] 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. The location of the Debtors' service address in these Chapter 11 Cases is: P.O. Box 240130, San Antonio, Texas 78224.

**DISCLOSURE STATEMENT, DATED JANUARY ~~22~~23, 2025**

**SOLICITATION OF VOTES ON THE *MODIFIED FIRST AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF ZACHRY HOLDINGS, INC. AND ITS DEBTOR AFFILIATES* PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE FROM HOLDERS OF CLAIMS IN THE FOLLOWING CLASSES:**

| VOTING CLASS | NAME OF CLASS UNDER THE PLAN |
|---|---|
| CLASS 3 | PREPETITION CREDIT FACILITY CLAIMS |
| CLASS 6 | GENERAL UNSECURED CLAIMS |

**IF YOU ARE IN CLASS 3 OR 6, YOU ARE RECEIVING THIS DISCLOSURE STATEMENT, THE PLAN, AND OTHER ACCOMPANYING MATERIALS BECAUSE YOU ARE ENTITLED TO VOTE ON THE PLAN.**

**THIS SOLICITATION IS BEING CONDUCTED TO OBTAIN SUFFICIENT VOTES TO ACCEPT THE MODIFIED FIRST AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF ZACHRY HOLDINGS, INC. AND ITS DEBTOR AFFILIATES IN THE ABOVE CAPTIONED CHAPTER 11 CASES (COLLECTIVELY, THE "DEBTORS"), ATTACHED HERETO AS EXHIBIT A (THE "PLAN").**

**THE VOTING DEADLINE TO ACCEPT OR REJECT THE PLAN IS 4:00 P.M. (PREVAILING CENTRAL TIME) ON FEBRUARY 20, 2025, UNLESS EXTENDED BY THE DEBTORS IN WRITING OR BY ORDER OF THE COURT.**

**THE VOTING RECORD DATE FOR DETERMINING WHICH HOLDERS OF CLAIMS MAY VOTE ON THE PLAN IS JANUARY 22, 2025 (THE "VOTING RECORD DATE").**

**ANY VOTES CAST DURING THE SOLICITATION OF THE INITIAL PLAN WILL NOT COUNT TOWARDS ACCEPTANCE OR REJECTION OF THE PLAN. EVEN IF YOU PREVIOUSLY SUBMITTED A VOTE ON THE INITIAL PLAN, YOU SHOULD RETURN YOUR BALLOT ACCEPTING OR REJECTING THE PLAN TO ENSURE YOUR VOTE IS COUNTED.**

**HOWEVER, IF YOU PREVIOUSLY SUBMITTED AN OPT-OUT FORM ELECTING TO OPT-OUT OF THE THIRD-PARTY RELEASE, YOUR OPT-OUT ELECTION REMAINS VALID AND EFFECTIVE. PARTIES WHO PROPERLY SUBMITTED OPT-OUT FORMS IN CONNECTION WITH SOLICITATION OF THE INITIAL PLAN NEED NOT RE-SUBMIT ANY OPT-OUT FORM.**

The general framework for the Plan is as follows:

- The Prepetition Credit Facility will be amended and restated and deemed binding on the Debtors and Holders of Prepetition Credit Facility Claims as of the Plan's Effective Date. The Debtors have had productive discussions with the steering committee representing the Holders of Prepetition Credit Facility Claims and anticipate reaching agreement on the terms of the amended and restated facility during the solicitation of the Plan. The Debtors will disclose the material terms of the facility, as agreed among the parties, in the A&R Credit Facility Term Sheet, which will be included in the Plan Supplement prior to the deadline to vote on the Plan.

- Allowed General Unsecured Claims of $25,000 or less will be treated as Convenience Claims. Convenience Claims are unimpaired and will receive a cash distribution of the full Allowed amount of such Claims, up to $25,000. Holders of General Unsecured Claims in excess of $25,000 may elect on their ballot to reduce their General Unsecured Claims to $25,000 and receive the Convenience Claim treatment.

- General Unsecured Claims that are not Convenience Claims will receive beneficial interests in a liquidating GUC Trust. On the Effective Date, the Debtors will issue the GUC Trust Unsecured Note to the GUC Trust. The face amount of the GUC Trust Unsecured Note will equal the value of Allowed General Unsecured Claims in the aggregate, and its terms will provide for the present value of Allowed General Unsecured Claims. The cash proceeds of the GUC Trust Unsecured Note shall be distributed pro rata to Holders of Allowed General Unsecured Claims. The material terms of the GUC Trust Unsecured Note will be set forth in the GUC Trust Unsecured Note Term Sheet ~~to be included in the Plan Supplement~~. The GUC Trust Unsecured Note Term Sheet is under negotiation by the Debtors and the Committee as of the date hereof.

- The immediate parent company of ZHI will make a capital contribution, totaling $50 million, to ZHI on or prior to the Effective Date~~, the material terms of which shall be set forth in the A&R Credit Facility Term Sheet~~. Of the $50 million, $20 million will be in the form of forgiveness of intercompany liabilities and $30 million will be a cash contribution from the immediate parent company. The non-Debtor Affiliates of the Debtors have sufficient liquidity to fund the Parent Capital Contribution in the amount currently proposed by the Debtors. The Debtors will establish at the Combined Hearing that the Plan is feasible, including on account of the Parent Capital Contribution.

- The Debtors will assume and cure all executory contracts and unexpired leases that are not otherwise rejected pursuant to the Plan or a separate motion.

- Interests in ZHI will be reinstated and the legal, equitable, and contractual rights associated with such interests shall remain unaltered.

Further, the Debtors have worked diligently to minimize the impact of these Chapter 11 Cases on their trade creditors, including by arranging for payment of trade claims through various Court-approved processes and by non-Debtor joint venture parties. As the following chart shows, hundreds of millions of dollars of trade claims have been satisfied through the GPX Settlement (described in detail in **Article VI.I**), the Debtors' OPPD Project settlement (described below in **Article VI.N**), the Debtors' designation of certain trade partners as critical vendors, and other payments by the Debtors' joint venture partners, including KZJV for amounts owed on the PLNG Project.

| **Satisfied and Outstanding ~~Trade Debt~~Unsecured Claims as of January 22, 2025** | |
|---|---|
| Postpetition Settlement, Critical Vendor, and Third-Party Payments Made During the Chapter 11 Cases | $610.77 million |
| Outstanding Total Trade and WARN Claims – as of January 22, 2025 | $132.50 million |

Of the $~~132.5~~132.50 million of outstanding trade debt, only approximately $~~57.4~~57.40 million ~~is~~of such claims are projected to be treated as General Unsecured Claims under the Plan:[3]

| ~~Total General~~**Proposed Classification and Treatment of $132.50 Million of Outstanding Unsecured Claims** | |
|---|---|
| ~~Total Trade Claims – as of January 22, 2025~~ | ~~$132.50 million~~ |
| ~~Secured,~~ Priority~~,~~ and Section 503(b)(9) Claims | ~~$5.50~~5.50 million[4] |
| Cure Claims | -$58.50 million |
| Convenience Claims | -$4.10 million |
| WARN Settlement | -$7.0 million |
| Total General Unsecured Claims | $57.40 million |

For the subset of trade claims that have not been paid during the Chapter 11 Cases and that will be treated as General Unsecured Claims, such Claims will still recover in full under the Plan. As a result, distributions to all stakeholders—including Holders of Allowed General Unsecured Claims and Allowed Prepetition Credit Facility Claims—will be significantly greater under the Plan than in a chapter 7 liquidation. The Plan will also provide the Reorganized Debtors with sufficient liquidity to continue providing first-class services to their customers, while also ensuring the Company's long-term viability.

The Debtors are currently discussing the Plan's terms with their stakeholders, including the Holders of Prepetition Credit Facility Claims and the Committee. The Debtors intend to complete those negotiations during solicitation, confirm the Plan by the end of February 2025, and emerge quickly thereafter. Accordingly, the Debtors have filed a motion seeking conditional approval of the Disclosure Statement, proposing the following key dates relating to the plan process, subject to Court approval and availability.

| Event | Date |
|---|---|
| Voting Record Date | Wednesday, January 22, 2025 |
| Hearing on Conditional Approval of the Disclosure Statement | Thursday, January 23, 2025 at 9:00 a.m. (prevailing Central Time) |
| Solicitation Deadline | Thursday, January 30, 2025 or 5 Business Days after entry of the Disclosure Statement Order |
| Publication Deadline | Thursday, January 30, 2025 or as soon as reasonably practicable thereafter |
| Deadline to: (i) file (A) GUC Trust Unsecured Note Term Sheet and (B) GUC Trust Agreement; and (ii) share the Debtors' most recent draft and the Prepetition Lenders' most recent draft of the A&R Credit Facility Term Sheet with the Committee | Wednesday, February 5, 2025 |

[3] The amounts described herein are subject to further review and reconciliation by the Debtors' Professionals.

[4] This amount includes an estimated $2.87 million of trade claims to be treated as Other Secured Claims.

| | |
|---|---|
| Deadline to File Rule 3018 Motions | Thursday, February 13, 2025 at 4:00 p.m. (prevailing Central Time) |
| Plan Supplement Deadline | Thursday, February 13, 2025 |
| Deadline for Committee to File Plan Objection | Wednesday, February 19, 2025 at 1:30 p.m. (prevailing Central Time) |
| Voting, Plan Objection, and Third-Party Release Opt-Out Deadline | Thursday, February 20, 2025 at 4:00 p.m. (prevailing Central Time) |
| Deadline to File ~~Voting Report~~Confirmation Brief | ~~Tuesday~~Sunday, February ~~25~~23, 2025 at 1:30 p.m. (prevailing Central Time) |
| Deadline to File ~~Confirmation Brief~~Voting Report | Tuesday, February 25, 2025 |
| Combined Hearing Date | Wednesday, February 26, 2025 ~~or such other date and time as may be scheduled by the Bankruptcy Court~~at 1:30 p.m. (prevailing Central Time) |

The Committee reserves the right to seek to adjourn its objection deadline and the Combined Hearing in the event that the Debtors file material modifications to the GUC Trust Unsecured Note Term Sheet, the GUC Trust Agreement, or the A&R Credit Facility Term Sheet after February 5, 2025.

The Debtors believe that the Plan is in the best interests of the Debtors' Estates and stakeholders and represents the best available restructuring transaction at this time. Accordingly, the Debtors strongly recommend that Holders of Claims entitled to vote on the Plan vote to accept the Plan.

## II. SUMMARY OF PLAN CLASSIFICATION AND TREATMENT

### A. Classified Claims and Interests

#### 1. Classified Claims and Interest Summary

**Article III** of the Plan classifies Claims against and Interests in the Debtors and sets forth the treatment for each Class. The following chart provides a summary of the anticipated recovery to Holders of Allowed Claims and Allowed Interests under the Plan. Your ability to receive distributions under the Plan depends upon the ability of the Debtors to consummate the Plan.

**THE PROJECTED RECOVERIES SET FORTH IN THE TABLE BELOW ARE ESTIMATES ONLY AND, THEREFORE, ARE SUBJECT TO CHANGE. REFERENCE SHOULD BE MADE TO THE ENTIRE PLAN FOR A COMPLETE DESCRIPTION OF THE DEBTORS' CLASSIFICATION AND TREATMENT OF CLAIMS AND INTERESTS.**[45]

[45] The recoveries set forth in the chart are, in some cases, based on the estimated going concern value of the Reorganized Debtors, and may change based upon changes in the amount of Claims that are Allowed as well as other factors related to the Debtors' business assets and

The Debtors shall File the Plan Supplement with the Bankruptcy Court no later than seven (7) calendar days before the Voting Deadline. The Plan Supplement may include initial drafts of the documents to be included in the Plan Supplement and may be further updated or modified after such deadline. If the Plan Supplement is updated or otherwise modified, such modified or updated documents will be made available on the Debtors' restructuring website.

**E. Voting on the Plan**

The Voting Deadline is **February 20, 2025, at 4:00 p.m. (prevailing Central Time)**. Holders of Claims in the Voting Classes are able to return their Ballots in hard copy or submit them electronically on the Debtors' online balloting portal. Ballots must be (1) properly completed, executed, and delivered timely via first-class mail, regular mail, overnight courier, or hand delivery to the Claims and Noticing Agent at 222 N. Pacific Coast Hwy., Ste. 300, El Segundo, CA 90245 or (2) submitted timely through the Debtors' online balloting portal on the Debtors' case website at ~~www.veritaglobal.net/zhi.~~www.veritaglobal.net/zhi.

Holders of Claims entitled to vote that cast a Ballot using the Debtors' online portal should **NOT** also submit a paper Ballot. The Debtors' online balloting portal is the sole manner in which Ballots will be accepted via electronic or online transmission. **Ballots submitted via facsimile, email, or other means of electronic transmission will not be counted**.

The Debtors reserve the right, at any time or from time to time, to extend the period of time (on a daily basis, if necessary) during which Ballots will be accepted for any reason, including determining whether or not the requisite number of acceptances have been received, by making a public announcement of such extension no later than the first Business Day next succeeding the previously announced Voting Deadline. The Debtors will give notice of any such extension in a manner deemed reasonable to the Debtors in their discretion.

**Any votes cast on the Initial Plan will not count toward acceptance or rejection of the Plan. Even if you previously submitted a vote on the Initial Plan, you should return your Ballot accepting or rejecting the Plan to ensure your vote is counted.**

**However, if you previously submitted an Opt-Out Form electing to opt-out of the Third-Party Release, your opt-out election remains valid and effective. Parties who properly submitted Opt-Out Forms in connection with solicitation of the Initial Plan need not re-submit any Opt-Out Form.**

**F. Ballots Not Counted**

No ballot will be counted toward Confirmation if, among other things: (1) it partially rejects and partially accepts the Plan; (2) it both accepts and rejects the Plan; (3) it is sent to the Debtors, the Debtors' agents (other than the Claims and Noticing Agent), the Committee, the Prepetition Credit Facility Agent, or the Professionals; (4) it is sent via facsimile or any electronic means other than via the Debtors' online balloting portal; (5) it is illegible or contains insufficient information to permit the identification of the Holder of the Claim; (6) it is cast by an Entity that does not hold a Claim in the Class indicated in Item 1 of the Ballot; (7) it is submitted by a Holder not entitled to vote pursuant to the Plan; (8) it is unsigned; (9) it is a non-original Ballot (excluding those Ballots submitted via the Debtors' online balloting portal); and (10) it is not marked to accept or reject the Plan.

**IF A BALLOT IS RECEIVED AFTER THE VOTING DEADLINE, IT WILL NOT BE COUNTED UNLESS THE DEBTORS, IN THEIR DISCRETION, DETERMINE OTHERWISE OR BY ORDER OF THE COURT.**

**EACH HOLDER OF A CLAIM MUST VOTE ALL OF ITS CLAIMS WITHIN A PARTICULAR CLASS EITHER TO ACCEPT OR REJECT THE PLAN AND MAY NOT SPLIT SUCH VOTES. BY SIGNING AND RETURNING A BALLOT, EACH HOLDER OF A CLAIM WILL CERTIFY TO THE BANKRUPTCY COURT AND THE DEBTORS THAT NO OTHER BALLOTS WITH RESPECT TO SUCH CLAIM HAVE BEEN CAST OR, IF ANY OTHER BALLOTS HAVE BEEN CAST WITH**

**RESPECT TO SUCH CLASS OF CLAIMS, SUCH OTHER BALLOTS INDICATED THE SAME VOTE TO ACCEPT OR REJECT THE PLAN. IF A HOLDER CASTS MULTIPLE BALLOTS WITH RESPECT TO THE SAME CLASS OF CLAIMS AND THOSE BALLOTS ARE IN CONFLICT WITH EACH OTHER, SUCH BALLOTS WILL NOT BE COUNTED FOR PURPOSES OF ACCEPTING OR REJECTING THE PLAN.**

**IT IS IMPORTANT THAT THE HOLDER OF A CLAIM IN A VOTING CLASS FOLLOWS THE SPECIFIC INSTRUCTIONS PROVIDED ON SUCH HOLDER'S BALLOT. NO BALLOT VOTING TO ACCEPT THE PLAN MAY BE WITHDRAWN OR MODIFIED AFTER THE VOTING DEADLINE WITHOUT THE DEBTORS' PRIOR CONSENT OR PERMISSION OF THE BANKRUPTCY COURT.**

### G. Voting and Tabulation Procedures

The Debtors' procedures and standard assumptions for tabulating Ballots (the "**Voting and Tabulation Procedures**") are set forth below.

| | |
|---|---|
| **Votes Not Counted** | • Any Ballot that is illegible or contains insufficient information to permit the identification of the Holder of the Claim;<br>• Any Ballot that is not actually received by the Claims and Noticing Agent by the Voting Deadline, unless the Debtors determine otherwise or as permitted by the Court;<br>• Any unsigned Ballot;<br>• Any Ballot that partially rejects and partially accepts the Plan in a particular Voting Class;<br>• Any Ballot not marked to accept or reject the Plan in a particular Voting Class or marked both to accept and reject the Plan in a particular Voting Class;<br>• Any Ballot superseded by a later, timely submitted valid Ballot, including all paper ballots if an E-Ballot is submitted; and<br>• Any improperly submitted Ballot. |
| **No Vote Splitting** | • Holders are required to vote all of their Claims in a particular Voting Class to either accept or reject the Plan and are not permitted to split any votes in a particular Voting Class. |
| **Establishing Claim Amounts** | • Claim amounts for each Claim in a Voting Class will be pre-populated in the Ballots.<br>• Claim amounts for voting purposes:<br>(a) for Holders of Prepetition Credit Facility Claims will be established by reference to the list of recordholders maintained by the Prepetition Credit Facility Agent and provided to the Debtors;<br>(b) for Holders of General Unsecured Claims will be established by reference to the Debtors' Schedules and any filed Proof of Claim, as applicable, and subject to the following:<br>(i) the Claim amount Allowed by order of the Court;<br>(ii) the Claim amount (a) settled or agreed upon by the Debtors, as reflected in a document filed with the Court, or (b) set forth in an order of the Court;<br>(iii) the Claim amount Allowed (temporarily or otherwise) pursuant to a Resolution Event under these Voting and Tabulation Procedures;<br>(iv) the Claim amount listed in the Proof of Claim; *provided* that such Claim is not objected to by the Debtors;<br>(v) ~~(iv)~~ the Claim amount listed in the Schedules (to the extent such Claim is not superseded by a timely filed Proof of Claim), *provided* that such Claim is not scheduled as contingent, disputed, or unliquidated and/or |

| | |
|---|---|
| | has not been paid;<br>(vi) ~~(v)~~ if the Claim amount is listed in the Schedules as contingent, disputed, or unliquidated and/or has not been paid (to the extent such Claim is not superseded by a timely filed Proof of Claim), provided that if the applicable Claims Bar Date has not expired prior to the Voting Record Date, the amount of such Claim for voting purposes only (and not for ultimate distribution or allowance) shall be $1.00;<br>(vii) ~~(vi)~~ Proofs of Claim filed for $0.00 are not entitled to vote;<br>(viii) ~~(vii)~~ if a Claim for which a Proof of Claim has been timely and properly filed for unknown or undetermined amounts, or is unliquidated or contingent (as determined on the face of the Proof of Claim or after a reasonable review of the supporting documentation by the Debtors and the Claims and Noticing Agent), the amount of such Claim for voting purposes only (and not for ultimate allowance or distribution) shall be $1.00; *provided* that if a timely filed Proof of Claim is partially unliquidated or partially contingent (as determined on the face of the Proof of Claim or after a reasonable review of the supporting documentation by the Debtors and the Claims and Noticing Agent), such Claim is temporarily allowed in the amount that is liquidated and non-contingent for voting purposes only, and not for purposes of allowance or distribution;<br>(ix) ~~(viii)~~ notwithstanding anything to the contrary contained herein, any creditor who has filed or purchased duplicate Claims within the same Voting Class shall be provided with only one Solicitation Package and one Ballot for voting a single Claim in such Class, regardless of whether the Debtors have objected to such duplicate Claims; and<br>(x) ~~(ix)~~ if a Proof of Claim has been amended by a later Proof of Claim that is filed on or prior to the Voting Record Date, the later filed amending Proof of Claim shall be entitled to vote in a manner consistent with these Voting and Tabulation Procedures, and the earlier filed Proof of Claim shall be disallowed for voting purposes, regardless of whether the Debtors have objected to such amended Claim. Except as otherwise ordered by the Court, any amendments to Proofs of Claim after the Voting Record Date shall not be considered for purposes of these Voting and Tabulation Procedures.<br>• To the extent any Holder of a Claim in a Voting Class disagrees with the voting amount listed on its Ballot, it must file a motion under Bankruptcy Rule 3018 by the Rule 3018 Motion Deadline (as defined below) to request to vote in a different amount. |

**H. Disputed Claim Procedures**

The following procedures govern the treatment of Claims in a Voting Class subject to pending claims objections (the "**Disputed Claim Procedures**"):

1. Absent further order of the Court, the Holder of a Claim in a Voting Class that is the subject of a pending objection only to reclassify or reduce the amount of such Claim, *i.e.*, a "reclassify" claims objection or a "reduce and allow" claim objection, shall be entitled to vote such Claim in accordance with the proposed reclassification or in the reduced amount (as applicable) contained in such claim objection.

2. If a Claim in a Voting Class is subject to an objection other than a "reclassify" or "reduce and allow" objection that is filed with the Court ***on or prior*** to the Solicitation Deadline (a "**Disputed Claim**"), (a) the Debtor shall cause the applicable Holder to be served with the Disputed Claim Notice, and (b) the

Dated: January ~~22~~23, 2025

ZACHRY HOLDINGS, INC.
(for itself and on behalf of each of the other Debtors and Debtors in Possession)

By: */s/ Mohsin Y. Meghji*
Name: Mohsin Y. Meghji
Title: Chief Restructuring Officer