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.	)	
	)	
	)	
	)	

CONSOLIDATED PIPE AND SUPPLY COMPANY, INC. d/b/a HIGH COUNTRY FUSION'S OBJECTION TO MODIFIED FIRST AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION AND STIPULATION OF FACTS AND AGREED DETERMINATION OF EXCESS CLAIMS

Consolidated Pipe and Supply Company, Inc., d/b/a High Country Fusion ("Consolidated"), by and through undersigned counsel, and hereby files this objection to the *Modified First Amended Joint Chapter 11 Plan of Reorganization* (Doc. 1978) (the "Plan") and *Stipulation of Facts and Agreed Determination of Excess Claims* (Doc. 2150, Ex. G.) (the "Stipulation") filed by Debtor Zachry Holdings, Inc. and its affiliated debtors (collectively, "Debtors"). In support thereof, Consolidated states as follows:

1. Consolidated has filed proofs of claim for goods provided to Debtors, Golden Pass LNG Terminal, LLC ("Golden Pass") ,and certain other related entities in connection with the GPX Project (as such term is defined in the Stipulation) in the amount of $377,387.09 (the "Claims"). (*See* Claim Nos. 1453, 1478, 1649).

[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 https://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

2. On January 22, 2025, Debtors filed the Plan that, among other things, clarifies treatment for all creditors and seeks certain third-party releases in favor of, among other parties, Golden Pass and its affiliates. (*See* Doc. 1978).

3. On February 13, 2025, Debtors filed their *Notice of Filing of Second Plan Supplement* (Doc. 2150), which included the Stipulation.

4. The Stipulation provides, in pertinent part, that Golden Pass will pay certain amounts owed to third-parties, including Consolidated, in connection with the GPX Project with the exact amounts to be paid having been redacted.[2]

5. The Stipulation correctly notes that certain amounts remain due and owing to Consolidated for goods provided in connection with the GPX Project but fails to correctly identify the true amount owed for such goods.

6. In consideration of the fact that the Plan contemplates third-party releases for certain non-debtor parties, including Golden Pass, Consolidated hereby objects to the Plan and the Stipulation to the extent that either (or both) seek to limit the ability of Consolidated to either (i) recover the full amount of the Claims owed to Consolidated or (ii) seek recovery from any non-debtor third-party for amounts owed above what is set forth in the Stipulation and the accompanying schedules. For the avoidance of doubt, Consolidated does not object to receiving payment from Golden Pass or any other third-party in connection with the GPX Project but only files this Objection to ensure that the full amounts owed as set forth in the Claims are fully paid.

[2] Consolidated was provided with exact amounts that were proposed to be paid to Consolidated via the Stipulation but has intentionally omitted those amounts from this Objection to comply with the Court's order approving such amounts to be redacted from the Stipulation.

7. Consolidated reserves the right to supplement this Objection to the extent necessary prior to the confirmation hearing on the Plan to the extent necessary to clarify the extent of amounts owed to Consolidated pursuant to the Claims.

Respectfully submitted this the 20th day of February, 2025.

BY: */s/ Evan N. Parrott*
Evan N. Parrott

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on all parties receiving notice via the Court's CM/ECF system on this, the 20th day of February, 2025

/s/ Evan N. Parrott
Of Counsel