

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1**

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In re:  CBRM REALTY INC.,  Debtor. Tax I.D. No. 26-3782420	Chapter 11  Case No. 25-15343
In re:  CROWN CAPITAL HOLDINGS LLC,  Debtor. Tax I.D. No. 83-3721411	Chapter 11  Case No. 25-15351
In re:  KELLY HAMILTON APTS LLC,  Debtor. Tax I.D. No. 86-2751115	Chapter 11  Case No. 25-15352
In re:  KELLY HAMILTON APTS MM LLC,  Debtor. Tax I.D. No. 88-2310765	Chapter 11  Case No. 25-15350
In re:  RH CHENAULT CREEK LLC,  Debtor. Tax I.D. No. 82-3258987	Chapter 11  Case No. 25-15349

In re:  RH COPPER CREEK LLC,  Debtor. Tax I.D. No. 82-3270874	Chapter 11  Case No. 25-15346
In re:  RH LAKEWIND EAST LLC,  Debtor. Tax I.D. No. 82-3316963	Chapter 11  Case No. 25-15344
In re:  RH WINDRUN LLC,  Debtor. Tax I.D. No. 82-3290122	Chapter 11  Case No. 25-15345
In re:  RH NEW ORLEANS HOLDINGS LLC,  Debtor. Tax I.D. No. 82-3237528	Chapter 11  Case No. 25-15348
In re:  RH NEW ORLEANS HOLDINGS MM LLC,  Debtor. Tax I.D. No. 82-3331951	Chapter 11  Case No. 25-15347

**DEBTORS' MOTION FOR ENTRY OF AN ORDER  
DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

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The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) state as follows in support of this motion (this “**Motion**”):

**Relief Requested**

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Order**”), authorizing the Debtors to procedurally consolidate and jointly administer these chapter 11 cases. The Debtors request that the Court (as defined below) maintain

one file and one docket for all of the jointly administered cases under the case of CBRM Realty Inc., Case No. 25-15343.

### **Jurisdiction and Venue**

2. The United States Bankruptcy Court for the District of New Jersey (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11 of the United States District Court for the District of New Jersey*, entered July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.). This matter is a core proceeding under 28 U.S.C. § 157(b). The Debtors confirm their consent to entry of a final order by the Court.

3. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The predicates for the relief requested herein are sections 105(a) and 342(c)(1) of the Bankruptcy Code, rules 1015(b) and 2002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rules 9013-1 and 9013-5 of the Local Bankruptcy Rules for the District of New Jersey (the “**Local Rules**”).

### **Background**

5. On May 19, 2025 (the “**Petition Date**”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned chapter 11 cases. The Debtors continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors are requesting procedural consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b). No request for the appointment of a trustee or examiner has been made in these chapter 11 cases and no official committees have been appointed or designated.

**Basis for Relief**

6. Bankruptcy Rule 1015(b) provides, in pertinent part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015. The Debtors in these chapter 11 cases are “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code. Accordingly, the Bankruptcy Code and Bankruptcy Rules authorize the Court to grant the relief requested herein.

7. Joint administration is generally non-controversial, and courts in this jurisdiction routinely order joint administration in cases with multiple related debtors. *See, e.g., In re Invitae Corp.*, No. 24-11362 (MBK) (Bankr. D.N.J. Feb. 16, 2024) (directing joint administration of chapter 11 cases); *In re Careismatic Brands, LLC*, No. 24-10561 (VFP) (Bankr. D.N.J. Jan. 24, 2024) (same); *In re WeWork, Inc.*, Case No. 23-19865 (JKS) (Bankr. D.N.J. Nov. 8, 2023) (same); *In re Rite Aid Corp.*, Case No. 23-18993 (MBK) (Bankr. D.N.J. Oct. 16, 2023) (same); *In re Cyxtera Techs., Inc.*, Case No. 23-14853 (JKS) (Bankr. D.N.J. June 4, 2023) (same).

8. Joint administration of these chapter 11 cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many of the motions, hearings, and orders in these chapter 11 cases will affect each Debtor entity. The entry of an order directing joint administration of these chapter 11 cases will reduce fees and costs by avoiding duplicative filings and objections. Joint administration will also allow the Office of the United States Trustee for the District of New Jersey (the “**U.S. Trustee**”) and all parties in interest to monitor these chapter 11 cases with greater ease and efficiency.

9. Moreover, joint administration will not adversely affect the Debtors’ respective constituencies. This Motion seeks only administrative, not substantive, consolidation of

the Debtors' estates. Parties in interest will not be harmed by the relief requested; rather, parties in interest will benefit from (i) the cost reductions associated with the joint administration of these chapter 11 cases and (ii) ease of reference to one main case docket of Case No. 25-15343 throughout these chapter 11 cases. Accordingly, the Debtors submit that the joint administration of these chapter 11 cases is in the best interests of their estates, their creditors, and all other parties in interest.

10. The Debtors request that all orders, pleadings, papers, and documents, except proofs of claim, lists, schedules, and statements of financial affairs, be filed and docketed in the case number assigned to CBRM Realty Inc. (the "**Lead Case**"), bearing the caption as shown in Exhibit 1 to the Order attached hereto.

11. The Debtors also seek the Court's direction that a notation be entered on the docket in each of the Debtors' chapter 11 cases to reflect the joint administration of these cases.

12. Based on the foregoing, the Debtors submit that the relief requested is necessary and appropriate, is in the best interests of their estates and creditors and should be granted in all respects.

#### **Waiver of Memorandum of Law**

13. The Debtors respectfully request that the Court waive the requirement to file a separate memorandum of law pursuant to Local Rule 9013-1(a)(3) because the legal basis upon which the Debtors rely is set forth herein and the Motion does not raise any novel issues of law.

#### **No Prior Request**

14. No prior request for the relief sought in this Motion has been made to this or any other court.

**Notice**

15. The Debtors will provide notice of this Motion to the following parties and/or their respective counsel, as applicable: (a) the office of the United States Trustee for the District of New Jersey; (b) the DIP Lender; (c) Lynd Living; (d) the Ad Hoc Group of Holders of Crown Capital Notes; (e) the United States Attorney's Office for the District of New Jersey; (f) the Internal Revenue Service; (g) the attorneys general in the states where the Debtors conduct their business operations; (h) the U.S. Department of Housing and Urban Development; and (i) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

The Debtors respectfully request that the Court enter the Order, substantially in the form attached hereto, granting the relief requested in this Motion and such other and further relief as the Court deems appropriate under the circumstances.

Dated: May 20, 2025

Respectfully submitted,

/s/ Andrew Zatz

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**EXHIBIT A**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY <b>Caption in Compliance with D.N.J. LBR 9004-1</b>	
In re:  CBRM REALTY INC.,  Debtor. Tax I.D. No. 26-3782420	Chapter 11  Case No. 25-15343
In re:  CROWN CAPITAL HOLDINGS LLC,  Debtor. Tax I.D. No. 83-3721411	Chapter 11  Case No. 25-15351
In re:  KELLY HAMILTON APTS LLC,  Debtor. Tax I.D. No. 86-2751115	Chapter 11  Case No. 25-15352
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In re:  RH WINDRUN LLC,  Debtor. Tax I.D. No. 82-3290122	Chapter 11  Case No. 25-15345
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**ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

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The relief set forth on the following pages, numbered 3 through 5, is **ORDERED**.

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Debtors: CBRM Realty Inc., *et al.*

Case No.: 25-15343

Caption of Order: ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11  
CASES

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Upon the motion (the “**Motion**”)<sup>1</sup> of the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”), pursuant to sections 105(a) and 342(c)(1) of the Bankruptcy Code, rules 1015(b) and 2002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rules 9013-1 and 9013-5 of the Local Bankruptcy Rules for the District of New Jersey (the “**Local Rules**”), authorizing the Debtors to direct the joint administration of the Debtors’ chapter 11 cases for procedural purposes only, as more fully set forth in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11 of the United States District Court for the District of New Jersey*, entered July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.) and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Motion having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and upon consideration of the record of all of the proceedings had before the Court; and the Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

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Debtors: CBRM Realty Inc., *et al.*

Case No.: 25-15343

Caption of Order: ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11  
CASES

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1. The Motion is GRANTED on a final basis as set forth herein.
2. The above-captioned chapter 11 cases hereby are jointly administrated by this Court for procedural purposes only.
3. Nothing contained in the Motion or in this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these chapter 11 cases, and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases.
4. The Debtors shall maintain, and the Clerk of the United States Bankruptcy Court for the District of New Jersey shall keep, one consolidated docket, one file, and one consolidated service list for these chapter 11 cases.
5. All pleadings, papers, and documents filed in the Lead Case shall bear the caption as shown in **Exhibit 1** attached hereto.
6. The caption shown in **Exhibit 1** attached hereto satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.
7. All proofs of claim, lists, schedules, and statements of financial affairs shall be filed and docketed in the specific Debtor's case to which they are applicable.
8. Any party in interest may request joint hearings on matters pending in any of these chapter 11 cases.
9. The Clerk shall file a copy of this Order in the Lead Case and each of the affiliated Debtors' cases.
10. The Debtors shall file one monthly operating report on a consolidated basis, and such reports shall be docketed in the Lead Case; *provided* that each monthly operating report shall

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Debtors: CBRM Realty Inc., *et al.*

Case No.: 25-15343

Caption of Order: ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11  
CASES

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include language identifying an email address managed by the Debtors and/or their advisors, to which parties may send requests for additional information from the Debtors regarding the information contained in the monthly operating reports.

11. The requirement set forth in Local Rule 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.

12. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Local Rules are satisfied by such notice.

13. Any party may move for modification of this Order in accordance with Local Rule 9013-5(e).

14. A true copy of this Order shall be served on all required parties pursuant to Local Rule 9013-5(f).

15. This Order shall be effective immediately upon entry.

16. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

**Exhibit 1**

**Case Caption**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1**

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In re:

CBRM REALTY INC.,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-15343 (MBK)  
(Jointly Administered)

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: CBRM Realty Inc. (2420), Crown Capital Holdings LLC (1411), Kelly Hamilton Apts LLC (1115), Kelly Hamilton Apts MM LLC (0765), RH Chenault Creek LLC (8987), RH Copper Creek LLC (0874), RH Lakewind East LLC (6963), RH Windrun LLC (0122), RH New Orleans Holdings LLC (7528), and RH New Orleans Holdings MM LLC (1951). The location of the Debtors' service address in these chapter 11 cases is: 4499 Pond Hill Road, San Antonio Texas 78231.