

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., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-15343 (MBK)
(Joint Administration Requested)

¹ 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, RH Copper Creek LLC, RH Lakewind East LLC, RH Windrun LLC, RH New Orleans Holdings LLC, and RH New Orleans Holdings MM LLC. The location of the Debtors' service address in these chapter 11 cases is: 4499 Pond Hill Road, San Antonio Texas 78231.



APPLICATION FOR DESIGNATION AS A CHAPTER 11 COMPLEX CASE

This bankruptcy case was filed on May 19, 2025. The undersigned party in interest believes that this case qualifies under D.N.J. LBR 1002-2 and the Court's *General Order Governing Chapter 11 Complex Case Procedures*, dated August 1, 2024, as a Chapter 11 Complex Case because:

(select all applicable items)

 X The Debtors have total liabilities of more than \$50 million;

 X The Debtors have total assets of more than \$50 million;

 There are more than 1,000 creditors in this case;

 X The Debtors' case is of high public interest;

 Other: Substantial explanation required.

The Debtors respectfully request that the Court enter the Order, substantially in the form attached hereto, granting the relief requested in this Application 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
Caption in Compliance with D.N.J. LBR 9004-1

In re:

CBRM Realty Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 25–15343 (MBK)
(Joint Administration Requested)

ORDER GRANTING CHAPTER 11 COMPLEX CASE DESIGNATION

The relief set forth on the following pages, numbered 2 through 2, is hereby **ORDERED**.

¹ 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.

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Debtors: CBRM REALTY INC., *et al.*

Case No. 25-15343

Caption of Order: ORDER GRANTING CHAPTER 11 COMPLEX CASE DESIGNATION

After review of the initial pleadings filed in this case, the Court concludes that this case meets the eligibility requirements of a Chapter 11 Complex Case under D.N.J. LBR 1002-2, and therefore;

IT IS ORDERED that the request set forth in the *Application for Designation as a Chapter 11 Complex Case* pursuant to the Court's *General Order Governing Chapter 11 Complex Case Procedures* is **HEREBY GRANTED**; and

IT IS FURTHER ORDERED that the *Chapter 11 Complex Case Procedures* annexed to the Court's *General Order Governing Chapter 11 Complex Case Procedures* shall apply; and

IT IS FURTHER ORDERED that, within ____ days from the entry of this Order, the parties are directed to submit to the Court's chambers via email a proposed Case Management Order utilizing Local Form *Chapter 11 Complex Case Management Order*. The Case Management Order must attach as an exhibit the General Order with annexed Chapter 11 Complex Case Procedures. Provisions outside the scope of the General Order must be highlighted for the Court's review.