

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

**WHITE & CASE LLP**

Gregory F. Pesce (*pro hac vice* pending)  
Adam Swingle (*pro hac vice* pending)  
111 South Wacker Drive  
Chicago, Illinois 60606  
Telephone: (312) 881-5400  
Email: gregory.pesce@whitecase.com  
adam.swingle@whitecase.com

-and-

Andrew Zatz  
Barrett Lingle (*pro hac vice* pending)  
1221 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 819-8200  
Email: azatz@whitecase.com  
barrett.lingle@whitecase.com

*Proposed Counsel to Debtors and  
Debtors-in-Possession*

**KEN ROSEN ADVISORS PC**

Kenneth A. Rosen  
80 Central Park West  
New York, New York 10023  
Telephone: (973) 493-4955  
Email: ken@kenrosenadvisors.com

*Proposed Co-Counsel to Debtors and  
Debtors-in-Possession*

In re:

CBRM Realty Inc., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

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

**DEBTORS' APPLICATION FOR  
EXPEDITED CONSIDERATION OF FIRST DAY MATTERS**

<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.



The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) by and through their undersigned proposed counsel, submit this application for expedited consideration of first day matters pursuant to Rule 9013-5 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey and respectfully request that a hearing on the following applications and motions be provided on an expedited basis:

1. Debtors’ Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 7]
2. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated List of Debtors’ 30 Largest Unsecured Creditors, and (B) File a Consolidated List of Creditors in Lieu of Submitted a Separate Mailing Matrix for Each Debtor, (II) Approving the Form and Manner of Notifying Creditors of the Chapter 11 Cases and Other Information, and (III) Granting Related Relief [Docket No. 8]
3. Exhibit C to Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated List of Debtors’ 30 Largest Unsecured Creditors, and (B) File a Consolidated List of Creditors in Lieu of Submitted a Separate Mailing Matrix for Each Debtor, (II) Approving the Form and Manner of Notifying Creditors of the Chapter 11 Cases and Other Information, and (III) Granting Related Relief [Docket No. 9]
4. Application for Designation as a Chapter 11 Complex Case [Docket No. 10]

*[Remainder of page intentionally left blank]*

**WHEREFORE**, the Debtors respectfully request that the Court enter the Order, substantially in the form attached hereto as **Exhibit A**, granting the relief as is just and proper under the circumstances.

Dated: May 20, 2025

Respectfully submitted,

/s/ Andrew Zatz

**WHITE & CASE LLP**

Gregory F. Pesce (*pro hac vice* pending)

Adam Swingle (*pro hac vice* pending)

111 South Wacker Drive

Chicago, Illinois 60606

Telephone: (312) 881-5400

Email: gregory.pesce@whitecase.com

adam.swingle@whitecase.com

- and -

Andrew Zatz

Barrett Lingle (*pro hac vice* pending)

1221 Avenue of the Americas

New York, New York 10020

Telephone: (212) 819-8200

Email: azatz@whitecase.com

barrett.lingle@whitecase.com

*Proposed Counsel to Debtors and  
Debtors-in-Possession*

**KEN ROSEN ADVISORS PC**

Kenneth A. Rosen

80 Central Park West

New York, New York 10023

Telephone: (973) 493-4955

Email: ken@kenrosenadvisors.com

*Proposed Co-Counsel to Debtors and  
Debtors-in-Possession*

**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. <i>et al.</i> ,  Debtors. <sup>1</sup>

Chapter 11

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

**ORDER REGARDING DEBTORS' APPLICATION FOR  
EXPEDITED CONSIDERATION OF FIRST DAY MATTERS**

---

The relief set forth on the following pages, numbered 2 through 3, is hereby **ORDERED**.

---

<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.

(Page 2)

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

Case No. 25-15343

Caption of Order: ORDER REGARDING DEBTORS' APPLICATION FOR EXPEDITED  
CONSIDERATION OF FIRST DAY MATTERS

---

After review of the *Debtors' Application for Expedited Consideration of First Day Matters*

(the “**Application**”), and for good cause shown;

**IT IS HEREBY ORDERED THAT:**

1. The Application is GRANTED as set forth herein.
2. The following applications and motions (collectively, the “**Motions**”) are scheduled for hearing before the Honorable Michael B. Kaplan, Chief Judge, 402 East State Street, Trenton, New Jersey 08608, Courtroom #8 on May 27, 2025 at 11:30 a.m. (prevailing Eastern Time):

<b>Motion</b>	
1.	Debtors' Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 7]
2.	Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated List of Debtors' 30 Largest Unsecured Creditors, and (B) File a Consolidated List of Creditors in Lieu of Submitted a Separate Mailing Matrix for Each Debtor, (II) Approving the Form and Manner of Notifying Creditors of the Chapter 11 Cases and Other Information, and (III) Granting Related Relief [Docket No. 8]
3.	Exhibit C to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated List of Debtors' 30 Largest Unsecured Creditors, and (B) File a Consolidated List of Creditors in Lieu of Submitted a Separate Mailing Matrix for Each Debtor, (II) Approving the Form and Manner of Notifying Creditors of the Chapter 11 Cases and Other Information, and (III) Granting Related Relief [Docket No. 9]
4.	Application for Designation as a Chapter 11 Complex Case [Docket No. 10]

3. A true copy of this Order shall be served on all required parties pursuant to D.N.J.

LBR 9013-5(f).

(Page 3)

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

Case No. 25-15343

Caption of Order: ORDER REGARDING DEBTORS' APPLICATION FOR EXPEDITED  
CONSIDERATION OF FIRST DAY MATTERS

---

4. Objections and/or responses to the Motions, if any, may be made at the hearing pursuant to D.N.J. LBR 9013-5(d).

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.