

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

WHITE & CASE LLP

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

In re:

CBRM REALTY INC.,

Debtor.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 (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: In re CBRM Realty Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.



**NOTICE OF FILING REVISED PROPOSED
ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

PLEASE TAKE NOTICE THAT, on May 20, 2025, the above-captioned debtors and debtors in possession (the “**Debtors**”) filed *Debtors’ Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases* [Docket No. 7] (the “**Motion**”). Attached as an exhibit to the Motion was a proposed *Order Directing Joint Administration of Chapter 11 Cases* (the “**Order**”).

PLEASE TAKE FURTHER NOTICE THAT, on May 21, 2025, the Debtors filed their *Notice of Filing Revised Proposed Order Directing Joint Administration of Chapter 11 Cases* [Docket No. 19].

PLEASE TAKE FURTHER NOTICE THAT the Debtors are hereby filing a further revised Order attached hereto as **Exhibit A** and a redline version of the revised Order attached hereto as **Exhibit B** reflecting certain changes made to the Order since it was filed with the Bankruptcy Court.

[Remainder of page left intentionally blank]

Dated: May 27, 2025

Respectfully submitted,

/s/ Andrew Zatz

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Exhibit A

Further Revised 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., 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 Re: Docket No. 7

ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES

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

(Page 3)

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

Case No.: 25-15343

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

Upon the motion (the “**Motion**”)¹ 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:

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

(Page 4)

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

Case No.: 25-15343

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

1. The Motion is GRANTED 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. If pleadings, papers, or documents have been filed in any of the above-captioned cases other than the Lead Case prior to the entry of this Order, and those matters have not yet been heard and decided, the party who filed the pleading, paper, or document shall (i) refile the pleading, paper, or document in the Lead Case within three (3) business days of the entry of this Order, (ii)

(Page 5)

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

Case No.: 25-15343

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

set the pleading, paper, or document for hearing before the judge assigned to the Lead Case, and

(iii) notice the hearing to all appropriate parties.

10. The Clerk shall file a copy of this Order in the Lead Case and each of the affiliated Debtors' cases.

11. The Debtors shall file individual operating reports for each Debtor and such reports shall be docketed in the Lead Case.

12. 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.

13. 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.

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

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

16. This Order shall be effective immediately upon entry.

17. 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 B

Redline

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1	
WHITE & CASE LLP Gregory F. Pesce (<i>pro hac vice</i> pending) Adam Swingle (<i>pro hac vice</i> 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 (<i>pro hac vice</i> pending) 1221 Avenue of the Americas New York, New York 10020 Telephone: (212) 819-8200 Email: azatz@whitecase.com barrett.lingle@whitecase.com <i>Proposed Counsel to Debtors and Debtors-in-Possession</i> KEN ROSEN ADVISORS PC Kenneth A. Rosen 80 Central Park West New York, New York 10023 Telephone: (973) 493-4955 Email: ken@kenrosenadvisors.com <i>Proposed Co-Counsel to Debtors and Debtors-in-Possession</i>	
In re:	Chapter 11
CBRM REALTY INC., <i>et al.</i>	Case No. 25-15343 (MBK) (Jointly Administered)
Debtors. ¹	

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: In re CBRM Realty Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.

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

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.

Chapter 11

Case No. 25-15346

Tax I.D. No. 82-3270874	
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 <u>Re: Docket No. 7</u>

ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES

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

(Page 3)

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

Case No.: 25-15343

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

Upon the motion (the “**Motion**”)¹ 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:

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

(Page 4)

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

Case No.: 25-15343

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

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. If pleadings, papers, or documents have been filed in any of the above-captioned cases other than the Lead Case prior to the entry of this Order, and those matters have not yet been heard and decided, the party who filed the pleading, paper, or document shall (i) refile the

(Page 5)

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

Case No.: 25-15343

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

pleading, paper, or document in the Lead Case within three (3) business days of the entry of this Order, (ii) set the pleading, paper, or document for hearing before the judge assigned to the Lead Case, and (iii) notice the hearing to all appropriate parties.

10. ~~9.~~ The Clerk shall file a copy of this Order in the Lead Case and each of the affiliated Debtors' cases.

11. ~~10.~~ The Debtors shall file ~~one monthly~~ individual operating ~~report on a consolidated basis;~~ reports for each Debtor and such reports shall be docketed in the Lead Case; ~~provided that each monthly operating report shall 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.~~

12. ~~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.

13. ~~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.

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

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

16. ~~15.~~ This Order shall be effective immediately upon entry.

(Page 6)

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

Case No.: 25-15343

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

17. ~~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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Case No. 25-15343 (MBK)
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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: In re CBRM Realty Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.