

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)

**DEBTORS' APPLICATION FOR
EXPEDITED CONSIDERATION OF DIP MOTION**

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



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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 the *Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief* [Docket No. 61].

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.

[Remainder of page intentionally left blank]

Dated: May 29, 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 REGARDING DEBTORS' APPLICATION FOR
EXPEDITED CONSIDERATION OF DIP MOTION**

The relief set forth on the following page, numbered 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: In re CBRE Realty, Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.

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

Case No. 25-15343

Caption of Order: ORDER REGARDING DEBTORS' APPLICATION FOR EXPEDITED CONSIDERATION OF DIP MOTION

After review of the *Debtors' Application for Expedited Consideration of the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief* (the “**Application**”), and for good cause shown;

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.
2. The Motion is scheduled for hearing on **June 2, 2025 at 1:00 p.m.** (prevailing Eastern Time) before the Honorable Michael B. Kaplan, Chief Judge, via Zoom (the “**Hearing**”):

Zoom Link: <https://njbuscourts.zoomgov.com/j/1605462580?pwd=V1JETVNtTk5QSW5GUnFud2FvR0FWQT09>,
Meeting ID: 160 546 2580
Passcode: 962296

3. The Hearing shall only be held if no objections to the relief requested in the Motion are filed prior to the commencement of the Hearing. To the extent any objections are filed and not resolved prior to the commencement of the Hearing, the Hearing will be rescheduled to a later date and time.

4. A true copy of this Order shall be served on all required parties pursuant to D.N.J. LBR 9013-5(f).

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.