

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)
(Jointly Administered)

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.



**CERTIFICATE OF NO OBJECTION WITH
RESPECT TO FINAL ORDER AUTHORIZING
THE DEBTORS TO PAY TENANT REIMBURSEMENTS**

PLEASE TAKE NOTICE THAT in connection with the *Debtors' Motion for Entry of Orders Authorizing the Debtors to Continue their Prepetition Business Operations, Policies, and Practices and Pay Related Claims in the Ordinary Course of Business on a Postpetition Basis* [Docket No. 34] (the “**Motion**”) and the *Interim Order Authorizing the Debtors to Pay Tenant Reimbursements* [Docket No. 104] (the “**Interim Order**”), the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), by and through their undersigned proposed counsel, hereby file this certificate of no objection.

PLEASE TAKE FURTHER NOTICE that the deadline for parties to file objections with respect to approval of the Motion on a final basis as to Tenant Reimbursements was June 10, 2025 (the “**Objection Deadline**”). No party filed an objection or response to the Motion as to Tenant Reimbursements as of the Objection Deadline. Counsel to the Debtors did not receive any other informal responses as of the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a clean version of a proposed order approving the relief requested in the Motion on a final basis as to Tenant Reimbursements (the “**Proposed Final Order**”) is attached hereto as **Exhibit A**. A redline of the Proposed Final Order to the Interim Order is attached hereto as **Exhibit B**. The Debtors respectfully request that the Court enter the Proposed Final Order.

Dated: June 16, 2025

Respectfully submitted,

/s/ Andrew Zatz

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

EXHIBIT A

Proposed Final 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)
(Jointly Administered)

**FINAL ORDER AUTHORIZING THE
DEBTORS TO PAY TENANT REIMBURSEMENTS**

The relief set forth on the following pages, numbered 2 through 5, 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 CBRM 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 (MBK)

Caption of Order: FINAL ORDER AUTHORIZING THE DEBTORS TO PAY TENANT
REIMBURSEMENTS

Upon the motion (the “**Motion**”)² of the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) for entry of a final order (this “**Final Order**”) authorizing the Debtors to pay Tenant Reimbursements on a final basis, all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein 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.) and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors’ notice of the Motion was appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED on a final basis as set forth herein and only as to the Tenant Reimbursements.
2. The Debtors are authorized on a final basis to pay Tenant Reimbursements in the ordinary course of business, on a postpetition basis.

² 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 (MBK)

Caption of Order: FINAL ORDER AUTHORIZING THE DEBTORS TO PAY TENANT
REIMBURSEMENTS

3. The Debtors shall maintain a matrix/schedule of amounts directly or indirectly paid, subject to the terms and conditions of this Final Order including the following information: (a) the names of the payee; (b) the amount of the payment; (c) the category, nature or type of payment; (d) the payment due, and (e) the Debtor or Debtors that made the payment. The Debtors shall provide a copy of such matrix/schedule to the U.S. Trustee and the advisors to any statutory committees that may be appointed in these chapter 11 cases weekly beginning upon entry of this Final Order.

4. Nothing contained in the Motion or this Final Order, and no action taken pursuant to the relief requested or granted as to the payment of Tenant Reimbursements on a final basis (including any payment made in accordance with this Final Order), is intended as or shall be construed or deemed to be: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication, admission or finding that any particular claim is an administrative expense claim, other priority claim or otherwise of a type specified or defined in the Motion or this Final Order, except as otherwise provided for in this Final Order; (e) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (f) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (g) a waiver or limitation of any claims, causes of action or other rights of the Debtors or any other party in interest against any person or entity under the Bankruptcy Code or any other applicable law.

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

Case No. 25-15343 (MBK)

Caption of Order: FINAL ORDER AUTHORIZING THE DEBTORS TO PAY TENANT
REIMBURSEMENTS

5. The banks and financial institutions on which checks were drawn or electronic payment requests made in payment of the prepetition obligations approved herein are authorized and directed to receive, process, honor, and pay all such checks and electronic payment requests when presented for payment, and all such banks and financial institutions are authorized to rely on the Debtors' designation of any particular check or electronic payment request as approved by this Final Order.

6. The Debtors are authorized, on a final basis, to issue postpetition checks, or to effect postpetition fund transfer requests, in replacement of any checks or fund transfer requests that are dishonored as a consequence of these chapter 11 cases with respect to prepetition amounts owed in connection with any of the Tenant Reimbursements allowed pursuant to this Final Order.

7. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Final Order are immediately effective and enforceable upon its entry.

8. The Debtors and the Independent Fiduciary are authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Order in accordance with the Motion.

9. Any relief granted to the Debtors pursuant to this Final Order shall mean the Debtors, acting at the direction of the Independent Fiduciary.

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

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

Case No. 25-15343 (MBK)

Caption of Order: FINAL ORDER AUTHORIZING THE DEBTORS TO PAY TENANT
REIMBURSEMENTS

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

EXHIBIT B

Redline

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)
(Jointly Administered)

**~~INTERIM~~FINAL ORDER AUTHORIZING THE
DEBTORS TO PAY TENANT REIMBURSEMENTS**

The relief set forth on the following pages, numbered 2 through 5, 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 CBRM 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 (MBK)

Caption of Order: ~~INTERIM~~FINAL ORDER AUTHORIZING THE DEBTORS TO PAY
TENANT REIMBURSEMENTS

Upon the motion (the “**Motion**”)² of the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) for entry of ~~an~~a final order (this “~~Interim~~Final Order”) authorizing the Debtors to pay Tenant Reimbursements on ~~an interim~~a final basis, all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein 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.) and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors’ notice of the Motion was appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

² 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 (MBK)

Caption of Order: ~~INTERIM~~FINAL ORDER AUTHORIZING THE DEBTORS TO PAY
TENANT REIMBURSEMENTS

1. The Motion is GRANTED on ~~an interim~~a final basis as set forth herein and only as to the Tenant Reimbursements.

~~2. The final hearing (the “Final Hearing”) on the Motion only as to the payment of Tenant Reimbursements shall be held on June 17, 2025, at 1:00 p.m., prevailing Eastern Time. Objections or responses to entry of a final order on the Motion shall be filed on or before 4:00 p.m., prevailing Eastern Time, on June 10, 2025. If no objections are filed to the Motion, this Court may enter an order approving the relief requested in the Motion as to the payment of Tenant Reimbursements on a final basis without further notice or hearing.~~

2. ~~3.~~ The Debtors are authorized on ~~an interim~~a final basis to pay Tenant Reimbursements in the ~~amount of \$70,000~~ordinary course of business, on a postpetition basis.

3. ~~4.~~ The Debtors shall maintain a matrix/schedule of amounts directly or indirectly paid, subject to the terms and conditions of this ~~Interim~~Final Order including the following information: (a) the names of the payee; (b) the amount of the payment; (c) the category, nature or type of payment; (d) the payment due, and (e) the Debtor or Debtors that made the payment. The Debtors shall provide a copy of such matrix/schedule to the U.S. Trustee and the advisors to any statutory committees that may be appointed in these chapter 11 cases weekly beginning upon entry of this ~~Interim~~Final Order.

4. ~~5.~~ Nothing contained in the Motion or this ~~Interim~~Final Order, and no action taken pursuant to the relief requested or granted as to the payment of Tenant Reimbursements on ~~an interim~~a final basis (including any payment made in accordance with this ~~Interim~~Final Order), is intended as or shall be construed or deemed to be: (a) an admission as to the amount of, basis

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

Case No. 25-15343 (MBK)

Caption of Order: ~~INTERIM~~FINAL ORDER AUTHORIZING THE DEBTORS TO PAY
TENANT REIMBURSEMENTS

for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication, admission or finding that any particular claim is an administrative expense claim, other priority claim or otherwise of a type specified or defined in the Motion or this ~~Interim~~Final Order, except as otherwise provided for in this ~~Interim~~Final Order; (e) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (f) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (g) a waiver or limitation of any claims, causes of action or other rights of the Debtors or any other party in interest against any person or entity under the Bankruptcy Code or any other applicable law.

5. ~~6.~~ The banks and financial institutions on which checks were drawn or electronic payment requests made in payment of the prepetition obligations approved herein are authorized and directed to receive, process, honor, and pay all such checks and electronic payment requests when presented for payment, and all such banks and financial institutions are authorized to rely on the Debtors' designation of any particular check or electronic payment request as approved by this ~~Interim~~Final Order.

6. ~~7.~~ The Debtors are authorized, on ~~an interim~~a final basis, to issue postpetition checks, or to effect postpetition fund transfer requests, in replacement of any checks or fund transfer requests that are dishonored as a consequence of these chapter 11 cases with respect to

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

Case No. 25-15343 (MBK)

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TENANT REIMBURSEMENTS

prepetition amounts owed in connection with any of the Tenant Reimbursements allowed pursuant to this ~~Interim~~Final Order.

~~8. The contents of the Motion satisfy the requirements of Bankruptcy Rule 6003(b).~~

7. ~~9.~~ Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this ~~Interim~~Final Order are immediately effective and enforceable upon its entry.

8. ~~10.~~ The Debtors and the Independent Fiduciary are authorized to take all actions necessary to effectuate the relief granted pursuant to this ~~Interim~~Final Order in accordance with the Motion.

9. ~~11.~~ Any relief granted to the Debtors pursuant to this ~~Interim~~Final Order shall mean the Debtors, acting at the direction of the Independent Fiduciary.

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

11. ~~13.~~ 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.

~~14. The Debtors shall serve by regular mail or email a copy of this Interim Order and the Motion on all parties required to receive such service pursuant to Local Rule 9013-5(f).~~

~~15. Any party may move for modification of this Interim Order in accordance with Local Rule 9013-5(e).~~

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

Case No. 25-15343 (MBK)

Caption of Order: ~~INTERIM~~FINAL ORDER AUTHORIZING THE DEBTORS TO PAY
TENANT REIMBURSEMENTS

12. ~~16.~~ This Court retains exclusive jurisdiction with respect to all matters arising
from or related to the implementation, interpretation, and enforcement of this ~~Interim~~Final Order.