

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)

DEBTORS' APPLICATION FOR ORDER SHORTENING TIME

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 (9071), 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.



The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), by and through their undersigned counsel, request that the time period to notice a hearing on the *Debtors’ Motion for Entry of an Order (I) Approving (A) Bidding Procedures, the Sale Timeline, and the Form and Manner of Notice Thereof for the Kelly Hamilton Property, (B) the Debtors’ Entry Into and Performance Under the Stalking Horse Agreement, (C) Bid Protections in Connection with the Stalking Horse Agreement, and (D) Assumption and Assignment Procedures, and (II) Granting Related Relief* [Docket No. 281], filed contemporaneously herewith (the “**Bidding Procedures Motion**”), as required by Fed. R. Bankr. P. 2002, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and respectfully submit:²

1. A shortened time hearing is requested because: The Debtors have negotiated a Stalking Horse Agreement with the Kelly Hamilton DIP Lender and are prepared to conduct a sale process that would maximize the value of the Kelly Hamilton Property. Approval of the Bidding Procedures and the Debtors’ entry into the Stalking Horse Agreement on an expedited basis is critical to allow the Debtors to timely conduct a transparent marketing process, solicit higher and better offers for the Kelly Hamilton Property, confirm a chapter 11 plan by the September 4, 2025 milestone under the Kelly Hamilton DIP Facility, and consummate a value-maximizing transaction by the September 30, 2025 target closing date.

2. State the hearing dates requested: July 24, 2025.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006(c)(1).

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Bidding Procedures Motion.

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: July 11, 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)
(Jointly Administered)

ORDER SHORTENING TIME PERIOD FOR NOTICE

The relief set forth on the following pages, numbered 2 through 3, 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: ORDER SHORTENING TIME PERIOD FOR NOTICE

After review of the *Debtors' Application for Order Shortening Time* (the “**Application**”) of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”) for a reduction of time for a hearing on the *Debtors' Motion for Entry of an Order (I) Approving (A) Bidding Procedures, the Sale Timeline, and the Form and Manner of Notice Thereof for the Kelly Hamilton Property, (B) the Debtors' Entry Into and Performance Under the Stalking Horse Agreement, (C) Bid Protections in Connection with the Stalking Horse Agreement, and (D) Assumption and Assignment Procedures, and (II) Granting Related Relief* [Docket No. 281], filed contemporaneously herewith (the “**Bidding Procedures Motion**”), under Fed. R. Bankr. P. 9006(c)(1).

IT IS HEREBY ORDERED THAT:

1. The hearing will be conducted on the matter before the Honorable Michael B. Kaplan, Chief Judge, 402 East State Street, Trenton, New Jersey 08608, Courtroom #8 on _____, 2025 at ____ (prevailing Eastern Time).

2. The Debtors must serve a copy of this Order and all related documents to all parties in interest by either regular mail or email, as applicable.

3. Service must be made within ____ days of the date of this Order.

4. Notice by telephone is not required.

5. Any objections to the relief sought in the Bidding Procedures Motion shall be filed by _____, 2025, at ____ (prevailing Eastern Time).

6. The hearing will be conducted via Zoom. Parties may appear in person at the Courthouse if they so desire. Parties who wish to present argument remotely via Zoom must request Presenter Status by submitting an email to Chambers

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

Case No. 25-15343 (MBK)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE

(chambers_of_mbk@njb.uscourts.gov) including the following information: Name of Presenter, Email Address of Presenter, Presenter's Affiliation with the Case and/or What Party or Interest the Presenter Represents. If the request is approved, the Presenter will receive appropriate Zoom credentials and further instructions via email. Parties can also attend the hearing for observation purposes only by joining the Zoom webinar. The Zoom link and additional information will be available on the Court's website: <https://www.njb.uscourts.gov/content/honorable-michael-b-kaplan>.