

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.<sup>1</sup>

Chapter 11

Case No. 25–15343 (MBK)  
(Jointly Administered)

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**DEBTORS' APPLICATION FOR ORDER SHORTENING TIME**

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<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 (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) Conditionally Approving the Adequacy of the Information Contained in the Disclosure Statement, (II) Approving the Solicitation and Voting Procedures with Respect to Confirmation of the Plan, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief* [Docket No. 283], filed contemporaneously herewith (the “**Solicitation Motion**”), as required by Fed. R. Bankr. P. 2002, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and respectfully submit:<sup>2</sup>

1. A shortened time hearing is requested because: The Debtors have filed the Plan and Disclosure Statement to facilitate their emergence from bankruptcy. Establishing solicitation procedures on an expedited basis will allow the Debtors to promptly commence the solicitation of votes on the Plan and meet the milestone set forth in the Kelly Hamilton DIP Credit Agreement, attached as Exhibit A to the Final Kelly Hamilton DIP Order [Docket No. 178], stipulating that the Debtors must obtain confirmation of the Plan no later than September 4, 2025.

2. State the hearing dates requested: July 24, 2025 at 1:00 p.m. (prevailing Eastern Time).

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

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Solicitation 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.<sup>1</sup>

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**.

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<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 (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.

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

Case No. 25-15343 (MBK)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE

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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) Conditionally Approving the Adequacy of the Information Contained in the Disclosure Statement, (II) Approving the Solicitation and Voting Procedures with Respect to Confirmation of the Plan, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief* [Docket No. 283], filed contemporaneously herewith (the “**Solicitation 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 Solicitation 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

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(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>.