

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

BUCHANAN INGERSOLL & ROONEY PC

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Attorneys for the City of Pittsburgh, Pennsylvania

In Re:

CBRM REALTY. INC., *et al.*¹,

Debtors.

Chapter 11

Case No. 25-15343 (MBK)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS PURSUANT
TO 11 U.S.C. § 1109(b) AND BANKRUPTCY RULES 2002(g) AND 9010**

PLEASE TAKE NOTICE that Mark Pfeiffer and Buchanan Ingersoll & Rooney PC ("BIR") are counsel to the City of Pittsburgh, Pennsylvania. Pursuant to 11 U.S.C. § 1109(b) and Bankruptcy Rules 2002(g) and 9010, BIR hereby appears in the above-captioned case(s) and hereby requests that all notices and all papers served or required to be served in this case by the Court, the Debtor, and/or any other parties-in-interest, be given to and served upon the following:

BUCHANAN INGERSOLL & ROONEY PC

700 Alexander Park, Suite 300

Princeton, NJ 08540-6347

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).



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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, notices and papers referred to in Bankruptcy Rules and also includes, without limitation, any plans of reorganization and disclosure statements and objections thereto, notices, orders, pleadings, motions, applications, complaints, schedules of assets and liabilities, operating reports, answering or reply papers, memoranda and briefs in support of any of the foregoing, pleadings, hearing dates, requests, demand, replies and any other documents brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, or otherwise.

PLEASE TAKE FURTHER NOTICE that if any limited service lists are used in these proceedings, the undersigned request inclusion thereon.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall not constitute a submission by the City of Pittsburgh, Pennsylvania for itself or on behalf of any other party, to the jurisdiction of the Bankruptcy Court. This Notice of Appearance and any subsequent appearance, pleading, claim or suit is not intended and shall not be deemed to waive any substantive or procedural rights of the City of Pittsburgh, Pennsylvania or any other party, including (i) the right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) the right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn by the United States District Court in any matter subject to mandatory

or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which the City of Pittsburgh, Pennsylvania or any other party is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. This request for notice does not constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Federal or Local Rules of Bankruptcy or Civil Procedure.

Dated: August 26, 2025

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

By: /s/ Mark Pfeiffer

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CERTIFICATION OF SERVICE

I, Mark Pfeiffer, hereby certify that on August 26, 2025, I caused to be served the NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS upon all parties via ECF notification.

Dated: August 26, 2025

BUCHANAN INGERSOLL & ROONEY PC

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