

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)

<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.



In re:

LAGUNA RESERVE APTS INVESTOR LLC,

Debtor.

Tax I.D. No. N/A

Chapter 11

Case No. 25-18643 (MBK)  
(Joint Administration Requested)

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**NOTICE OF DEADLINES FOR THE  
FILING OF PROOFS OF CLAIM, INCLUDING  
REQUESTS FOR PAYMENTS UNDER SECTION 503(b)(9) OF THE  
BANKRUPTCY CODE, AGAINST LAGUNA RESERVE APTS INVESTOR LLC**

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**PLEASE TAKE NOTICE** that, on August 17, 2025 (the “**Petition Date**”), Laguna Reserve Apts Investor LLC (“**Laguna Reserve**”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of New Jersey (the “**Court**”). On that same day, the above-captioned debtors and debtors in possession (collectively, the “**Initial Debtors**” and together with Laguna Reserve, the “**Debtors**”) filed the *Debtors’ Motion for an Order (A) Applying Certain Orders in Initial Debtors’ Chapter 11 Cases to Debtor Laguna Reserve Apts Investor LLC and (B) Granting Related Relief* [Docket No. 387] (the “**Motion**”). A proposed order was attached thereto.

**PLEASE TAKE FURTHER NOTICE** that, on August 25, 2025, the Debtors filed the *Notice of Filing of Revised Order (A) Applying Certain Orders in Initial Debtors’ Chapter 11 Cases to Debtor Laguna Reserve Apts Investor LLC and (B) Granting Related Relief* [Docket No. 447]. A revised proposed order (the “**Proposed Order**”) was attached thereto as Exhibit A.

**PLEASE TAKE FURTHER NOTICE** that the Motion and Proposed Order seeks to apply the *Order (I) Setting the Claims Bar Dates, (II) Setting the Rejection Damages Bar Date and the Amended Schedules Bar Date, (III) Approving the Form and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Notice of Bar Dates* [Docket No. 227] (the “**Bar Date Order**”) entered in the Initial Debtors cases on June 27, 2025, to Laguna Reserve, effective *nunc pro tunc* to the Petition Date.<sup>2</sup> The Bar Date Order established certain dates by which parties holding prepetition claims against the Debtors must file proofs of claim, including requests for payment pursuant to section 503(b)(9) of the Bankruptcy Code (“**Proofs of Claim**”).

**PLEASE TAKE FURTHER NOTICE** that, on August 29, 2025, Laguna Reserve filed its schedules of assets and liabilities and statements of financial affairs [Docket No. 16] (the “**Laguna Reserve Schedules and Statements**”).

**PLEASE TAKE FURTHER NOTICE** that if the Proposed Order is entered holders of claims against Laguna Reserve must file Proofs of Claim on account of such claims so that they are actually received by the Claims and Noticing Agent, in accordance with the instructions set

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Bar Date Order.

forth in the Bar Date Order, by the later of (a) the Governmental Bar Date, if applicable, which is **November 17, 2025, at 5:00 p.m., prevailing Eastern Time**; and (b) 5:00 p.m., prevailing Eastern Time, on the date that is twenty-one (21) days from the date Laguna Reserve filed the Laguna Reserve Schedules and Statements, which is **September 19, 2025 at 5:00 p.m., prevailing Eastern Time**.

**PLEASE TAKE FURTHER NOTICE** that a hearing will be conducted on the Motion and Proposed Order before the Honorable Michael B. Kaplan, Chief Judge, 402 East State Street, Trenton, New Jersey 08608, Courtroom #7 on September 4, 2025 at 11:30 a.m. (prevailing Eastern Time). Any objections to the relief sought in the Motion and Proposed Order may be presented orally at the hearing.

**PLEASE TAKE FURTHER NOTICE** that 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 (chambers\_of\_mbk@njb.uscourts.gov) including the following information: Name of Presenter, Email Address of Presenter, Presenters 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-bkaplan>.

**PLEASE TAKE FURTHER NOTICE** that copies of Proofs of Claim, the Laguna Reserve Schedules and Statements, the Proposed Order, the Bar Date Order, and other information regarding these chapter 11 cases are available for inspection free of charge on the Debtors' website at <https://www.veritaglobal.net/cbrm>.

*[Remainder of page intentionally left blank]*

Dated: August 29, 2025

Respectfully submitted,

/s/ Andrew Zatz

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