

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Anne Puluka¹
Kevin Quisenberry²
COMMUNITY JUSTICE PROJECT
100 Fifth Avenue, Suite 900
Pittsburgh, PA 15222
Tel: 412-434-6002
Fax: 412-434-5706
E-mail: apuluka@cjplaw.org
kquisenberry@cjplaw.org

-and-

Douglas G. Leney
ARCHER & GREINER, P.C.
1025 Laurel Oak Road
Voorhees, NJ 08043
Tel: 215-963-3300
Fax: 215-963-9999
E-mail: dleney@archerlaw.com

Counsel for Creditor, Chardell Bacon

In re:

CBRM REALTY INC.,

Debtors.³

Chapter 11

Case Number: 25-15343 (MBK)
(Jointly Administered)

Hearing Date: Shortened Notice Requested

¹ *Pro Hac Vice* admission pending.

² *Pro Hac Vice* admission pending.

³ 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.



APPLICATION FOR ORDER SHORTENING TIME

The applicant, Chardell Bacon (“Movant”), hereby respectfully requests that the time period for Movant’s emergency motion to testify by remote means at deposition and confirmation hearing (the “Motion”) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reason(s) set forth below:

1. A shortened time hearing is requested because: As more fully set forth in the Motion, Movant is a “very low income” person within the meaning of the U.S. Housing Act, 42 U.S.C. 1437f *et seq.*, and implementing regulations of the U.S. Department of Housing and Urban Development. Accordingly, travel to New Jersey on an immediate basis for testimony would present an extreme hardship to Ms. Bacon due to her work schedule and childcare obligations, and the costs of such travel would be impossible for Ms. Bacon to cover.
2. State the hearing date requested: **September __, 2025 at __.M.**, or such other date and at such time as the Court’s schedule may permit.
3. Reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006(c)(1).
4. The Movant requests entry of the proposed order shortening time.

Date: September 2, 2025

/s/ Douglas G. Leney

Douglas G. Leney
ARCHER & GREINER, P.C.
1025 Laurel Oak Road
Voorhees, NJ 08043-3506
(856) 795-2121
(856) 795-0574 (fax)
E-mail: dleney@archerlaw.com

Anne Puluka⁴
Kevin Quisenberry⁵
COMMUNITY JUSTICE PROJECT
100 Fifth Avenue, Suite 900
Pittsburgh, PA 15222
T: 412-434-6002
E-mail : apuluka@cjplaw.org
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100 Fifth Avenue, Suite 900
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Tel: 412-434-6002
Fax: 412-434-5706
E-mail: apuluka@cjplaw.org
kquisenberry@cjplaw.org

-and-

Douglas G. Leney
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1025 Laurel Oak Road
Voorhees, NJ 08043
Tel: 215-963-3300
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Counsel for Creditor, Chardell Bacon

In re:

CBRM REALTY INC.,

Debtors.⁸

Chapter 11

Case Number: 25-15343 (MBK)
(Jointly Administered)

Hearing Date: Shortened Notice Requested

**ORDER SHORTENING TIME PERIOD FOR NOTICE,
SETTING HEARING, AND LIMITING NOTICE**

The relief set forth on the following pages two (2) through three (3) is hereby

ORDERED.

⁶ *Pro Hac Vice* admission pending.

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Debtor(s): CBRM Realty Inc.

Case No(s).: 25-15343 (MBK)

Caption of Order: *Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice*

After review of the application of Chardell Bacon (the “Movant”) for a reduction of time for a hearing on Movant’s emergency motion to testify by remote means at deposition and confirmation hearing (the “Motion”), it is ORDERED as follows:

1. A telephonic hearing will be conducted on the Motion on _____, **2025 at**
_____. **.M.** via Zoom.

2. The Movant must serve a copy of this Order, the Motion, and all related documents on the following parties: the above-captioned Debtor, Debtor’s counsel, and the Office of the United States Trustee, and

By ☐ each, ☐ any of the following methods selected by the Court:

☐ fax, ☐ overnight mail, ☐ regular mail, ☐ email, ☐ hand delivery

3. The Movant must also serve a copy of this Order, the Motion, and all related documents, on the following parties: _____

by ☐ each, ☐ any of the following methods selected by the Court:

☐ fax, ☐ overnight mail, ☐ regular mail, ☐ email, ☐ hand delivery

4. Service must be made:

☐ on the same day as the date of this order, or

☐ within _____ day(s) of the date of this Order.

5. Notice by telephone:

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Debtor(s): CBRM Realty Inc.

Case No(s).: 25-15343 (MBK)

Caption of Order: *Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice*

☐ is not required

☐ must be provided to _____

☐ on the same day as the date of this Order, or

☐ within _____ day(s) of the date of this Order.

6. A Certification of Service must be filed prior to the hearing date.

7. Any objections to the Motion:

☐ must be filed with the Court and served on all parties in interest by electronic

or overnight mail _____ day(s) prior to the scheduled hearing; or

☐ may be presented at the hearing.

8. ☐ Court appearances are required to prosecute the motion/application and any objections.

☐ Parties may request to appear by phone by contacting Chambers prior to the return date.