

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

In Re:

CBRM REALTY. INC., *et al.*¹,

Debtors.

Chapter 11

Case No. 25-15343 (MBK)

(Jointly Administered)

**APPLICATION FOR ADMISSION OF
KELLY M. NEAL, ESQ. PRO HAC VICE**

The undersigned hereby seeks an Order granting the admission *pro hac vice* of Kelly M. Neal, Esq. of the law firm Buchanan Ingersoll & Rooney PC to practice before this Court in connection with the above captioned proceeding. This application (the “Application”) is submitted pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (“Local Rules”). Unless requested by other parties, no oral argument is requested. A proposed form of Order is submitted with the Motion. In support of the Application, the undersigned hereby represents as follows:

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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1. I am an attorney at law of the State of New Jersey, a member of the law firm Buchanan Ingersoll & Rooney PC (“BIR”) which maintains an office at 700 Alexander Park, Suite 300, Princeton, NJ 08540-6347 and am admitted to practice before this Court. BIR has been retained to serve as counsel for the City of Pittsburgh (the “City”) in connection with the above captioned proceeding.

2. I submit this Application, pursuant to Civil Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Local Rule 9010 1, in support of an Order Approving Admission, *Pro Hac Vice*, of Kelly M. Neal, Esq. to this Court.

3. Mrs. Neal is an attorney with the law firm Buchanan Ingersoll & Rooney PC, which maintains an address of Union Trust Building, 501 Grant Street, Suite 200, Pittsburgh, Pennsylvania 15219.

4. Attached is a certification of Mrs. Neal in which she certifies that she is, and has been, a member in good standing of the Bar of Commonwealth of Pennsylvania since 2009, the District Court and Bankruptcy Court for the Western District of Pennsylvania since 2009, the District Court and Bankruptcy Court for the Northern District of Ohio since 2018, the District Court and Bankruptcy Court for the Northern District of West Virginia since 2024, the State of Ohio since 2020, the State of West Virginia since 2020 and the Bankruptcy Court for the Central District of Illinois since 2011.

5. Additionally, Mrs. Neal certifies that she is and has remained a member in good standing of said bar at all times, that no disciplinary proceedings are pending against her in any jurisdiction and no discipline has previously been imposed on her in any jurisdiction.

6. Mrs. Neal is familiar with the circumstances surrounding the above captioned proceedings and applicable law, and her presence will serve the best interests of the City.

WHEREFORE, Applicant respectfully requests entry of the Order submitted herewith approving the admission, *pro hac vice*, of Kelly M. Neal, Esq. to represent the City as counsel in connection with the above captioned proceedings.

Dated: September 3, 2025

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

By: /s/ Mark Pfeiffer
700 Alexander Park, Suite 300
Princeton, NJ 08540-6347
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In Re:

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Debtors.

Chapter 11

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(Jointly Administered)

**CERTIFICATION OF KELLY M. NEAL, ESQ. IN
SUPPORT OF APPLICATION FOR ADMISSION *PRO HAC VICE***

Kelly M. Neal, Esq. certifies, pursuant to 28 U.S.C. §1746, as follows:

I am an attorney with the law firm of Buchanan Ingersoll & Rooney PC (“BIR”), which maintains an address of Union Trust Building, 501 Grant Street, Suite 200, Pittsburgh, Pennsylvania 15219.

I make this certification in support of my application (the “Application”) pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the “Local Rules”), for admission to the Bankruptcy Court *pro hac vice*. BIR has been retained

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to serve as counsel to the City of Pittsburgh (the “City”), in connection with the above-captioned proceeding.

I am and have been, a member in good standing of the Bar of Commonwealth of Pennsylvania since 2009, the District Court and Bankruptcy Court for the Western District of Pennsylvania since 2009, the District Court and Bankruptcy Court for the Northern District of Ohio since 2018, the District Court and Bankruptcy Court for the Northern District of West Virginia since 2024, the State of Ohio since 2020, the State of West Virginia since 2020 and the Bankruptcy Court for the Central District of Illinois since 2011.

I am, and have remained, a member in good standing of said bar at all times. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

I am familiar with the circumstances surrounding the above-captioned bankruptcy case and applicable law, and my presence will serve the best interests of the City.

I am not admitted to practice law in the State of New Jersey and therefore believe it is necessary for me to seek *pro hac vice* admission in this proceeding.

If admitted *pro hac vice*, I agree to abide by the Local Bankruptcy Rules, and to make the payments to the Clerk of the United States Court for the District of New Jersey and the New Jersey Lawyer’s Fund for Client Protection as provided in Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and information.

Dated: September 3, 2025

/s/ Kelly M. Neal
Kelly M. Neal

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ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

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This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown, it is

ORDERED that Kelly M. Neal be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is fourth

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protect for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of the entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 0712
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

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CERTIFICATION OF SERVICE

I, Mark Pfeiffer, hereby certify that on September 3, 2025, I caused to be served the APPLICATION FOR ADMISSION OF KELLY M. NEAL, ESQ. *PRO HAC VICE* upon all parties via ECF notification.

Dated: September 3, 2025

BUCHANAN INGERSOLL & ROONEY PC

By: /s/ Mark Pfeiffer

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