

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

WHITE & CASE LLP

Gregory F. Pesce (admitted *pro hac vice*)
111 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 881-5400
Email: gregory.pesce@whitecase.com

- and -

Andrew Zatz
Samuel P. Hershey (admitted *pro hac vice*)
Barrett Lingle (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Email: azatz@whitecase.com
sam.hershey@whitecase.com
barrett.lingle@whitecase.com

Counsel to Debtors and Debtors-in-Possession

KEN ROSEN ADVISORS PC

Kenneth A. Rosen
80 Central Park West
New York, New York 10023
Telephone: (973) 493-4955
Email: ken@kenrosenadvisors.com

Co-Counsel to Debtors and Debtors-in-Possession

In re:

CBRM Realty Inc. *et al.*,

Debtors.¹

Chapter 11

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

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), RH New Orleans Holdings MM LLC (1951), and Laguna Reserve Apts Investor LLC (N/A). 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.



**NOTICE OF *AMENDED*² AGENDA OF MATTERS SET FOR HEARING
ON SEPTEMBER 4, 2025 AT 10:00 A.M. (PREVAILING EASTERN TIME)**

To: All Parties Receiving Electronic Notification of Filing via the Court's CM/ECF System

PLEASE TAKE NOTICE that the following matters are currently scheduled to be heard on **September 4, 2025 at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Michael B. Kaplan.

PLEASE TAKE FURTHER NOTICE that Parties wishing to attend virtually and be heard must submit a presenter request to Chambers_of_MBK@njb.uscourts.gov.

I. RESOLVED MATTER

1. Emergency Motion of Chardell Bacon to Testify By Remote Means at Deposition and Confirmation Hearing [Docket No. 465]

A. **Responses Received:**

1. None.

B. **Related Documents:**

1. Application for Order Shortening Time [Docket No. 466]

Status: Matter is resolved. No hearing is necessary.

II. MATTERS GOING FORWARD

1. 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 Form of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates With Respect Thereto, and (V) Granting Related Relief [Docket No. 283]

A. **Responses Received:**

1. United States Trustee's Objection to the Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates [Docket No. 460]
2. Objection of the City of Pittsburgh to: (A) the Debtors' Sale Motion for the Kelly Hamilton Property and (B) Confirmation of Debtor's Plan of

² Amendments to the agenda are noted in *bold and italics*.

Reorganization and Request for the Appointment of an Examiner Pursuant to 11 U.S.C. § 1104(C)(1) [Docket No. 455]

3. (I) Objection of Chardell Bacon—on Her Own Behalf and on Behalf of Those Similarly-Situated—to Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of its Debtor Affiliates and to Approval of the Kelly Hamilton Sale Transaction; and (II) Motion to Certify Class of Objectors Pursuant to Bankruptcy Rules 9014 and 7023 [Docket No. 453]

B. **Related Documents:**

1. *Proposed* Order (I) Approving the Disclosure Statement, (II) Confirming the Amended Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates, and (III) Granting Related Relief [Docket No. 505]
2. *Proposed* Stipulation and Agreed Order Resolving the City of Pittsburgh's and Chardell Bacon's Objections to (I) Confirmation of the Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Affiliates and (II) the Kelly Hamilton Sale Transaction [Docket No. 504]
3. *Second Notice of Filing of Plan Supplement [Docket No. 502]*
4. *Notice of Filing Amended Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates (With Technical Modifications) [Docket No. 500]*
5. Declaration of Justin Utz, in Support of Final Approval of the Disclosure Statement and Confirmation of the Amended Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates [Docket No. 472]
6. Declaration of Matthew Dundon, Principal of IslandDundon LLC, in Support of Final Approval of the Disclosure Statement and Confirmation of the Amended Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates [Docket No. 471]
7. Debtors' (I) Memorandum of Law in Support of (A) Final Approval of the Disclosure Statement and (B) Confirmation of the Amended Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates and (II) Omnibus Reply to Objections Thereto [Docket No. 470]
8. Notice of Filing Amended Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates [Docket No. 469]
9. Declaration of Andres A. Estrada with Respect to the Solicitation and the Tabulation of Votes on the Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates [Docket No. 462]
10. Certificate of Service [Docket No. 457]

11. Declaration of James H. Millar Regarding the Appointment of Mr. Daniel B. Kamensky as Trustee to the Proposed Creditor Recovery Trust [Docket No. 456]
12. Notice of Filing Plan Supplement [Docket No. 411]
13. Affidavit of Publication [Docket No. 366]
14. Notice of Errata Regarding Disclosure Statement for the Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates [Docket No. 360]
15. 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 Form of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates With Respect Thereto, and (V) Granting Related Relief [Docket No. 349]
16. Notice of Filing Revised Disclosure Statement for the Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of its Debtor Affiliates [Docket No. 339]
17. Notice of Filing Revised Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates [Docket No. 338]
18. Order (I) Approving (A) Bidding Procedures, the Sale Timeline, and the Form and Manner of Notice Thereof for the Kelly Hamilton Property, (B) the Debtors' Entry Into and Performance Under the Stalking Horse Agreement, (C) Bid Protections in Connection with the Stalking Horse Agreement, and (D) Assumption and Assignment Procedures, and (II) Granting Related Relief [Docket No. 325]
19. Declaration of Matthew Dundon, Principal of IslandDundon LLC, in Support of Debtors' Motion for Entry of an Order (I) Approving (A) Bidding Procedures, the Sale Timeline, and the Form and Manner of Notice Thereof for the Kelly Hamilton Property, (B) the Debtors' Entry Into and Performance Under the Stalking Horse Agreement, (C) Bid Protections in Connection with the Stalking Horse Agreement, and (D) Assumption and Assignment Procedures, and (II) Granting Related Relief [Docket No. 313]
20. Disclosure Statement for the Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates [Docket No. 247]
21. Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of Its Debtor Affiliates [Docket No. 246]
22. Declaration of Matthew Dundon, Principal of IslandDundon LLC, in Support of Debtors' Motion for Entry of an Order (I) Authorizing the

Debtors to Obtain Postpetition Financing, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Docket No. 156]

23. Matthew Dundon, Principal of IslandDundon LLC, in Support of Debtors' Chapter 11 Petitions and First Day Pleadings [Docket No. 44]

Status: Going forward.

2. Debtors' Motion for Entry of an Order (I) Conditionally Approving the Adequacy of the Information Contained in the Disclosure Statement for the NOLA Debtors, (II) Approving the Solicitation and Voting Procedures With Respect to Confirmation of the Plan, (III) Approving the Form of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates With Respect Thereto, and (V) Granting Related Relief [Docket No. 391]

A. **Responses Received:**

1. None.

B. **Related Documents:**

1. *Notice of Filing of Liquidation Analysis to Disclosure Statement for the Modified Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of Its Debtor Affiliates [Docket No. 508]*
2. *Notice of Filing Revised Proposed Order (I) Conditionally Approving the Adequacy of the Information Contained in the Disclosure Statement for the NOLA Debtors, (II) Approving the Solicitation and Voting Procedures With Respect to Confirmation of the Plan, (III) Approving the Form of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates With Respect Thereto, and (V) Granting Related Relief [Docket No. 506]*
3. *Notice of Filing Disclosure Statement for Modified Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of Its Debtor Affiliates [Docket No. 503]*
4. *Notice of Filing Modified Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of Its Debtor Affiliates [Docket No. 501]*
5. Order Shortening Time Period for Notice [Docket No. 397]
6. Debtors' Application for Order Shortening Time [Docket No. 392]
7. Disclosure Statement for the Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of Its Debtor Affiliates [Docket No. 390]

8. Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of Its Debtor Affiliates [Docket No. 389]

Status: Going forward.

3. 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]

A. **Responses Received:**

1. None.

B. **Related Documents:**

1. 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 [Docket No. 463]
2. Schedules of Assets and Liabilities of Laguna Reserve Apts Investor LLC [Docket No. 16]³
3. Notice of Filing 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]
4. Supplemental Declaration of Eric W. Kaup in Support of Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Hilco Real Estate, LLC as Real Estate Advisors Effective July 16, 2025 [Docket No. 443]
5. Supplemental Declaration of Michael Kemether in Support of Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Larry G. Schedler & Associates, Inc. as Real Estate Advisor, Consultant, and Exclusive Real Estate Broker Effective as of July 10, 2025 [Docket No. 442]
6. Supplemental Declaration of Larry G. Schedler in Support of Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Larry G. Schedler & Associates, Inc. as Real Estate Advisor, Consultant, and Exclusive Real Estate Broker Effective as of July 10, 2025 [Docket No. 441]
7. Supplemental Declaration of Evan J. Gershbein in Support of Debtors' Application for Entry of an Order Authorizing the Appointment of

³ Reference made to the docket maintained in the Laguna Reserve Apts Investor LLC chapter 11 case, Case No. 25-18643 (MBK).

Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date [Docket No. 440]

8. Supplemental Verified Statement of Kenneth A. Rosen in Support of Application by the Debtors to Employ Chapter 11 New Jersey Counsel [Docket No. 439]
9. Notice of Filing 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. 438]
10. Supplemental Declaration of Gregory F. Pesce in Support of Application for Entry of an Order Authorizing the Retention and Employment of White & Case LLP as Debtors' Counsel, Effective as of the Petition Date [Docket No. 437]
11. ***Order Authorizing the Retention and Employment of Hilco Real Estate, LLC as Real Estate Advisors Effective as of July 16, 2025 [Docket No. 435]***
12. ***Order Authorizing the Retention and Employment of Larry G. Schedler & Associates, Inc. as Real Estate Advisor, Consultant, and Exclusive Real Estate Broker Effective as of July 10, 2025 [Docket No. 434]***
13. Order Shortening Time Period for Notice [Docket No. 396]
14. Debtors' Application for Order Shortening Time [Docket No. 388]
15. ***Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of This Court [Docket No. 324]***
16. ***Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business [Docket No. 323]***
17. 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]
18. ***Final Order Authorizing the Debtors to Continue Their Prepetition Business Operations, Policies, and Practices and Pay Related Claims in the Ordinary Course of Business on a Postpetition Basis [Docket No. 226]***
19. ***Order Authorizing the Retention and Employment of White & Case LLP as Debtors' Counsel, Effective as of the Petition Date [Docket No. 225]***

20. *Order Approving Employment of Chapter 11 New Jersey Counsel [Docket No. 224]*
21. *Order Authorizing the Debtors' Employment and Retention of Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date [Docket No. 172]*
22. *Final Order (I) Authorizing the Debtors to (A) Continue Operating Their Cash Management System, (B) Honor Certain Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Granting Related Relief [Docket No. 165]*
23. *Final Order (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors, and (B) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (II) Approving the Form and Manner of Notifying Creditors of the Chapter 11 Cases and Other Information, and (III) Granting Related Relief [Docket No. 164]*
24. *Chapter 11 Complex Case Management Order [Docket No. 122]*
25. *Order Authorizing the Appointment of Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date [Docket No. 101]*
26. *Order Granting Chapter 11 Complex Case Designation [Docket No. 57]*
27. *Order Directing Joint Administration of Chapter 11 Cases [Docket No. 51]*

Status: Going forward.

4. Debtors' Motion for Entry of an Order (I) Enlarging the Period Within Which the Debtors May Remove Actions and (II) Granting Related Relief [Docket No. 385]

A. **Responses Received:**

1. None.

B. **Related Documents:**

1. Order Shortening Time Period for Notice [Docket No. 401]
2. Debtors' Application for Order Shortening Time [Docket No. 398]

Status: Going forward.

Dated: September 4, 2025

Respectfully submitted,

/s/ Andrew Zatz

WHITE & CASE LLP

Gregory F. Pesce (admitted *pro hac vice*)
111 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 881-5400
Email: gregory.pesce@whitecase.com

- and -

Andrew Zatz

Samuel P. Hershey (admitted *pro hac vice*)
Barrett Lingle (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Email: azatz@whitecase.com
sam.hershey@whitecase.com
barrett.lingle@whitecase.com

Counsel to Debtors and Debtors-in-Possession

KEN ROSEN ADVISORS PC

Kenneth A. Rosen
80 Central Park West
New York, New York 10023
Telephone: (973) 493-4955
Email: ken@kenrosenadvisors.com

Co-Counsel to Debtors and Debtors-in-Possession