

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

WHITE & CASE LLP

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Counsel to Debtors and Debtors-in-Possession

KEN ROSEN ADVISORS PC

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80 Central Park West
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*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), 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.



**DECLARATION OF JONATHAN B. CERISE, ON BEHALF OF PROPOSED
ORDINARY COURSE PROFESSIONAL SHER GARNER CAHILL RICHTER
KLEIN & HILBERT, L.L.C.**

I, Jonathan B. Cerise, pursuant to Section 1746 of title 28 of the United States Code, hereby declare that the following is true to the best of my information, knowledge, and belief.

Relief Requested

1. I am a Member of Sher Garner Cahill Richter Klein & Hilbert, L.L.C., located at 909 Poydras Street, Suite 2800, New Orleans, Louisiana 70112 (the “**Company**”).
2. This Declaration is submitted in connection with an order of the United States Bankruptcy Court for the District of New Jersey authorizing CBRM Realty Inc., and/or its affiliated debtors (collectively, the “**Debtors**”) to retain certain professionals in the ordinary course of business during the pendency of the Debtors’ chapter 11 cases Docket No. 323 (the “**Order**”). Following the date that the Debtors commenced their chapter 11 cases (the “**Petition Date**”), the Debtors have requested that the Company provide legal services as local Louisiana counsel to the Debtors, and the Company has consented to provide such services.
3. The Company, through me, and other members, partners, associates, or employees of the Company, has provided, or plans to provide, the following services to the Debtors from and after the Petition Date: Legal services and advice based on Louisiana law, related to the proposed upsizing of a loan secured by numerous collateral properties located in Louisiana.
4. The Company may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in these cases. As part of its customary practice, the Company is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these cases. The Company does not perform services for any such person in connection with these cases. In addition, the

Company does not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

5. Neither I, nor any principal of, or professional employed by the Company has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Company.

6. Neither I, nor any principal of, or professional employed by the Company, insofar as I have been able to discover, holds or represents any interest adverse to the Debtors or their estates.

7. The Debtors owe the Company \$3,237.50 for prepetition services, the payment of which is subject to limitations contained in the United States Bankruptcy Code, 11 U.S.C. §§ 101– 1532.]

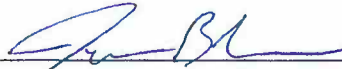
8. As of the Petition Date, the Company [was/was not] party to an agreement for indemnification with the Debtors. ~~[A copy of such agreement is attached as Exhibit 1 to this Declaration.]~~

9. At any time during the period of its employment, if the Company should discover any facts bearing on the matters described herein, the Company will supplement the information contained in this Declaration.

10. I, or a representative of the Company, have read and am familiar with the requirements of the Order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9TH day of September, 2025, in New Orleans, Louisiana, U.S.A.



Declarant – Jonathan B. Cerise, as a Member of
Sher Garner Cahill Richter Klein & Hilbert, L.L.C.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
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In re:

CBRM REALTY INC., *et al.*

Debtors.²

Chapter 11

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

RETENTION QUESTIONNAIRE

TO BE COMPLETED BY EACH ORDINARY COURSE PROFESSIONAL EMPLOYED BY THE DEBTORS

This Questionnaire will be filed with the Court and must be returned to:

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

KEN ROSEN ADVISORS PC

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- and -

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*Counsel to Debtors and
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If more space is needed, please complete on a separate page and attach.

1. Name and address of firm: Sher Garner Cahill Richter Klein & Hilbert, L.L.C.
909 Poydras Street, Suite 2800
New Orleans, Louisiana 70112

2. Date of retention: January 10, 2025

3. Type of services provided (accounting, legal, etc.):

Legal services as local Louisiana counsel

4. Brief description of services to be provided:

Legal services and advice based on Louisiana law, related to the proposed upsizing of a loan secured by numerous collateral properties located in Louisiana

5. Arrangements for compensation (hourly, contingent, etc.):

Hourly, with an anticipated "not to exceed" amount of \$7,500

6. Prepetition claims against the Debtors held by the firm (if any):

\$3,237.50 for legal services rendered from January 8, 2025, through February 24, 2025

(a) Average hourly rate (if applicable): \$563.00

(b) Estimated average monthly compensation: N/A

7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the company:

N/A

8. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to its estate with respect to the matters on which the above-named firm is to be employed:


N/A

9. Name and title of individual completing this Retention Questionnaire:

Jonathan B. Cerise, Member

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and information.

Dated: September 9, 2025


Jonathan B. Cerise, Esq.
Member
Sher Garner Cahill Richter Klein &
Hilbert, L.L.C.