

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)

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**DEBTORS' APPLICATION FOR ORDER SHORTENING TIME**

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<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), 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.



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The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), by and through their undersigned counsel, request that the time period for notice, service, and a hearing on the *Debtors’ Motion for Entry of an Order (I) Pursuant to Bankruptcy Rule 1014(b) Transferring Venue of In re Moshe Silber, Case No. 25-22890-SHL (Bankr. S.D.N.Y.) to the District of New Jersey and (II) Related Relief* [Docket No. 579] (the “**Motion**”), filed on September 25, 2025, as required by Local Bankruptcy Rule 9013-2(a), be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:<sup>2</sup>

1. A shortened time hearing is requested because: Moshe Silber, an affiliate of the Debtors, filed for bankruptcy protection in the United States Bankruptcy Court for the Southern District of New York on September 19, 2025: *In re Moshe Silber*, Case No. 25-22890-shl (Bankr. S.D.N.Y.) (the “**New York Proceeding**”). The Debtors filed in this Court, a motion to transfer venue of the New York Proceeding to New Jersey. To avoid relief being granted in the New York Proceeding before a decision is made on the Motion, the Debtors request a hearing on shortened time.

2. State the hearing dates requested: October 7, 2025, at 11 a.m. (prevailing Eastern Time).

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006(c)(1).

The Debtors request that the Court enter the Order, substantially in the form attached hereto as **Exhibit A**, granting the relief as is just and proper under the circumstances.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Transfer Motion.

Dated: September 25, 2025

Respectfully submitted,

/s/ Andrew Zatz

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**EXHIBIT A**

**Proposed Order**

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

In re:

CBRM Realty Inc., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

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

**ORDER SHORTENING TIME PERIOD FOR NOTICE**

The relief set forth on the following page, numbered 2 through 3, is hereby **ORDERED**.

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<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), 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.

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Debtors: CBRM REALTY INC., *et al.*

Case No. 25-15343 (MBK)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE

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After review of the *Debtors' Application for Order Shortening Time* (the “**Application**”) of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”) for a reduction of time for a hearing on the *Debtors' Motion for Entry of an Order (I) Pursuant to Bankruptcy Rule 1014(b) Transferring Venue of In re Moshe Silber, Case No. 25-22890-SHL (Bankr. S.D.N.Y.) to the District of New Jersey and (II) Related Relief* [Docket No. 579] (the “**Motion**”), filed on September 25, 2025, under Fed. R. Bankr. P. 9006(c)(1),

**IT IS HEREBY ORDERED THAT:**

1. The hearing will be conducted on the matter before the Honorable Michael B. Kaplan, Chief Judge, 402 East State Street, Trenton, New Jersey 08608, Courtroom #8 on \_\_\_\_\_, 2025 at \_\_\_\_\_ (prevailing Eastern Time).

2. The Debtors must serve a copy of this Order and all related documents to all parties in interest by either regular mail or email, as applicable.

3. Service must be made within \_\_\_\_ days of the date of this order.

4. Notice by telephone is not required.

5. Any objections to the relief sought in the Objection shall be filed by \_\_\_\_\_, 2025, at \_\_\_\_\_ (prevailing Eastern Time).

6. 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](mailto: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

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Debtors: CBRM REALTY INC., *et al.*

Case No. 25-15343 (MBK)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE

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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-b-kaplan>.