

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.¹



Order Filed on June 27, 2025

by Clerk
U.S. Bankruptcy Court
District of New Jersey

Chapter 11

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

**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**

The relief set forth on the following pages, numbered 2 through 15, is **ORDERED**.

DATED: June 27, 2025


Honorable Michael B. Kaplan
United States Bankruptcy Judge

¹ The Debtors in these chapter 11 cases, along with the last four cases, 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.



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(Page 2): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

Upon the motion (the “**Motion**”)² of the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”), pursuant to sections 105(a), 501, 502, 503 and 111(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), rules 2002, 3003, 5005, and 9008 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rules 9013-1 and 9013-5 of the Local Bankruptcy Rules for the District of New Jersey (the “**Local Rules**”), seeking entry of an order (this “**Bar Date Order**”), (i) setting the Claims Bar Date, the Governmental Bar Date, the Rejection Damages Bar Date, and the Amended Schedules Bar Date, (ii) approving the form and manner for filing such claims, including any requests for payment under section 503(b)(9) of the Bar Date Order, (iii) approving notice of the Bar Dates, and (iv) granting related relief; all as more fully set forth in the Motion; and a hearing with respect to the Motion having been held on June 26, 2025 (the “**Hearing**”); and notice of the Hearing having been given in accordance with Bankruptcy Rules 4001(b) and 9014 and Local Rules 4001-3 and 9013-5 and it appearing that no other or further notice need be provided; and the Court having considered the evidence submitted or adduced, and the statements of counsel made at the Hearing; and the Court having considered the relief requested in the Motion; and the relief requested being reasonable and appropriate; and that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and all objections, if any, to the relief requested in the Motion having been withdrawn, resolved, or overruled by the Court; and upon all of the

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

(Page 3): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

I. The Bar Dates and Procedures for Filing Proofs of Claim

2. Except as otherwise provided herein, all persons and entities³ including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts, that assert a Claim (as defined in section 101(5) of the Bankruptcy Code) against the Debtors (including any claim against any Debtor's officers, directors, or managers, in each case, in their respective capacities as such) that arose before the Petition Date, including Claims pursuant to section 503(b)(9) of the Bankruptcy Code, shall submit a written Proof of Claim, substantially in the form attached to the Motion as **Exhibit B**, so that it is actually received by Verita Global (the "**Claims and Noticing Agent**") before July 28, 2025 at 5:00 p.m., prevailing Eastern Time (the "**Claims Bar Date**"), in accordance with this Bar Date Order. The Debtors are authorized to extend the Claims Bar Date as to a specific claimant in their reasonable discretion.

3. The Debtors are authorized to take reasonable action to prevent individual creditors' personally identifiable information from being publicly available on the claims register.

³ All terms used but not defined herein that are specifically defined in the Bankruptcy Code, including "entity," "person," "claim," and "governmental unit," shall have the meanings ascribed to such terms in section 101 of the Bankruptcy Code.

(Page 4): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

4. Notwithstanding any other provision of this Bar Date Order, Proofs of Claim submitted by Governmental Units (as defined in section 101(27) of the Bankruptcy Code) must be submitted so as to be actually received by the Claims and Noticing Agent before November 17, 2025, at 5:00 p.m., prevailing Eastern Time (the “**Governmental Bar Date**”).

5. Any person or entity that holds a Claim arising from the rejection of an executory contract or unexpired lease must submit a Proof of Claim based on such rejection on or before the later of (a) the Claims Bar Date or Governmental Bar Date, as applicable, and (b) 5:00 p.m., prevailing Eastern Time, on the date that is thirty (30) days from the date of entry of such order, unless otherwise ordered by this Court (the “**Rejection Damages Bar Date**”). The Debtors will provide notice of the Rejection Damages Bar Date to the contract or lease counterparty whose contract or lease is being rejected at the time the Debtors reject such executory contract or unexpired lease.

6. In the event the Debtors amend their schedules of assets and liabilities and statements of financial affairs (collectively, the “**Schedules**”) after having given notice of the Bar Dates (as defined below), the Debtors shall give notice of any amendment to holders of claims affected thereby and such holders must file Proofs of Claim on account of such affected claims so that they are actually received by Claims and Noticing Agent, in accordance with the instructions set forth in this Bar Date Order, by the later of (a) the Claims Bar Date or Governmental Bar Date, as applicable, and (b) 5:00 p.m., prevailing Eastern Time, on the date that is twenty-one (21) days from the date the notice of the Schedule amendment is provided (the “**Amended Schedules Bar**”).

(Page 5): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

Date” and, together with the Claims Bar Date, the Governmental Bar Date, and the Rejection Damages Bar Date, the “**Bar Dates**”).

7. All Proofs of Claim must be filed or submitted so as to be actually received by the Claims and Noticing Agent on or before the applicable Bar Date. If Proofs of Claim are not received by the Claims and Noticing Agent on or before the applicable Bar Date, except in the case of certain exceptions explicitly set forth herein, the holders of the underlying claims shall be barred from asserting such claims against the Debtors and precluded from voting on any chapter 11 plan filed in these chapter 11 cases and/or receiving distributions from the applicable Debtor on account of such claims in these chapter 11 cases.

II. Parties Required to File Proofs of Claim

8. The following categories of claimants, in the capacities described below, shall be required to file a Proof of Claim by the Bar Date:

- a. any entity whose claim against a Debtor is not listed in the applicable Debtor’s Schedules or is listed as “contingent,” “unliquidated,” or “disputed” if such entity desires to participate in these chapter 11 cases or share in any distribution in any of these chapter 11 cases;
- b. any entity that believes its claim is improperly classified in the Schedules or is listed in an incorrect amount and who desires to have its claim allowed under a different classification or in an amount different than set forth in the Schedules;
- c. any former or present full-time, part-time, salaried, or hourly employee asserting a claim based on a grievance against any Debtor to the extent grounds for such grievance arose on or prior to the Petition Date;
- d. any entity that believes its prepetition claim as listed in the Schedules is not an obligation of the specific Debtor against which the claim is listed and

(Page 6): CBRM REALTY INC., *et al.*

Case No. 25-15343 (MBK)

Caption of Order: 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

that desires to have its claim allowed against a Debtor other than that identified in the Schedules; and

- e. any entity that believes that its claim against a Debtor is or may be an administrative expense pursuant to Bankruptcy Code section 503(b)(9).

III. Parties Not Required to File Proofs of Claim

9. The following categories of claimants, in the capacities described below, shall not be required to file a Proof of Claim by the Bar Date:

- a. the U.S. Trustee, on account of claims for fees payable pursuant to 28 U.S.C. § 1930;
- b. any entity that already has filed a signed Proof of Claim against the applicable Debtor with the Claims and Noticing Agent in a form substantially similar to Official Form 410 with respect to the claim asserted therein;
- c. any entity whose claim is listed on the Schedules and: (i) is **not** listed in the Schedules as “disputed,” “contingent,” or “unliquidated;” (ii) such entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) such entity does not dispute the claim is an obligation of the specific Debtor against which the claim is listed in the Schedules;
- d. any entity whose claim has previously been allowed by a final order of this Court;
- e. any Debtor having a claim against another Debtor;
- f. any entity whose claim is solely against any non-Debtor affiliate;
- g. any entity whose claim has been paid in full by a Debtor pursuant to the Bankruptcy Code or in accordance with a Court order;
- h. any counterparty to an executory contract or unexpired lease whose contract or lease has been assumed or assumed and assigned by the Debtors, solely with respect to claims arising under such contract or lease;

(Page 7): CBRM REALTY INC., *et al.*

Case No. 25-15343 (MBK)

Caption of Order: 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

- i. a current employee of the Debtors, if an order of this Court authorized the Debtors to honor such claim in the ordinary course of business as a wage, commission, or benefit; *provided* that a current or former employee must submit a Proof of Claim by the Claims Bar Date for all other claims arising before the Petition Date, including claims for wrongful termination, discrimination, harassment, hostile work environment, and/or retaliation;
- j. any current or former officer, manager, director, or employee for claims based on indemnification, contribution, or reimbursement;
- k. any entity holding a claim for which a separate deadline is fixed by this Court;
- l. any entity holding a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative expense; *provided* that any entity asserting a claim entitled to priority under section 503(b)(9) of the Bankruptcy Code must assert such claims by filing a request for payment or a Proof of Claim on or prior to the Claims Bar Date;
- m. any person or entity that is exempt from filing a Proof of Claim pursuant to an order of the Court in these chapter 11 cases;
- n. any entity providing debtor-in-possession financing and use of cash collateral approved by the Court;
- o. any entity holding an equity interest in any Debtor;
- p. DK1 Holdings LLC, CKD Funding LLC, and CKD Investor Penn LLC (in each case, in their respective capacities as prepetition secured lenders); and
- q. the Debtors' Independent Fiduciary.

IV. Requirements for Preparing and Filing Proofs of Claim

10. The following requirements shall apply with respect to filing and preparing each

Proof of Claim:

- a. **Contents.** Each Proof of Claim must: (i) be written in legible English; (ii) include a claim amount denominated in United States dollars;

(Page 8): CBRM REALTY INC., *et al.*

Case No. 25-15343 (MBK)

Caption of Order: 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

(iii) conform substantially with the Proof of Claim Form provided by the Debtors or Official Form 410; and (iv) be signed by the claimant or by an authorized agent or legal representative of the claimant on behalf of the claimant, whether such signature is an electronic signature or is ink.

- b. ***Section 503(b)(9) Claim.*** Any Proof of Claim asserting a claim entitled to priority under section 503(b)(9) of the Bankruptcy Code must also: (i) include the value of the goods delivered to and received by the Debtors in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which such claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtors under section 546(c) of the Bankruptcy Code (if applicable).
- c. ***Electronic Signatures Permitted.*** Only original Proofs of Claim signed electronically or in ink by the claimant or an authorized agent or legal representative of the claimant may be deemed acceptable for purposes of claims administration. Copies of Proofs of Claim, or Proofs of Claim sent by facsimile or electronic mail, will not be accepted.
- d. ***Identification of the Debtor Entity.*** Each Proof of Claim must clearly identify the specific Debtor against which a claim is asserted, including the individual Debtor's case number. A Proof of Claim filed under the joint administration case number (Case No. 25-15343), or otherwise without identifying a specific Debtor, will be deemed as filed only against CBRM Realty Inc. A Proof of Claim that names a subsidiary Debtor but is submitted under Case No. 25-15343 will be treated as having been submitted against the subsidiary Debtor with a notation that a discrepancy in the submission exists.
- e. ***Claim Against Multiple Debtor Entities.*** Each Proof of Claim must state a claim against only one Debtor and clearly indicate the Debtor against which the claim is asserted. To the extent more than one Debtor is listed on the Proof of Claim, such claim will be treated as if filed only against CBRM Realty Inc. If the holder asserts separate Claims against different Debtors, a separate Proof of Claim Form must be submitted with respect to each Claim; *provided* that a Claim that indicates it is filed against each Debtor by selecting the applicable Debtors at the top of the Proof of Claim Form shall be deemed to have been filed against each Debtor without the need to file additional Claims.

(Page 9): CBRM REALTY INC., *et al.*

Case No. 25-15343 (MBK)

Caption of Order: 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

- f. ***Supporting Documentation.*** Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d). If, however, such documentation is voluminous, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available. Any supporting documentation that includes personally identifiable information should be redacted or hidden prior to submission.
- g. ***Timely Service.*** Each Proof of Claim must be filed or submitted, including supporting documentation, through any of the following methods: (i) electronic submission through the Electronic Case Filing, (ii) electronic submission using the interface available on the Claims and Noticing Agent's website at <https://www.veritaglobal.net/cbrm> or (iii) if submitted through non-electronic means, by U.S. mail or other hand delivery system, so as to be actually received by the Claims and Noticing Agent on or before the Claims Bar Date, the Governmental Bar Date, or other applicable Bar Date, as applicable, at the following address:

If by First-Class Mail, Hand Delivery, or Overnight Mail:

CBRM Realty Inc. Claims Processing Center
c/o KCC dba Verita
222 N Pacific Coast Highway, Suite 300
El Segundo, CA 90245

- h. ***Receipt of Service.*** Claimants submitting a Proof of Claim through non-electronic means wishing to receive acknowledgment that their Proofs of Claim were received by the Claims and Noticing Agent must submit (i) a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form sent to the Claims and Noticing Agent) and (ii) a self-addressed, stamped envelope.

V. Identification of Known Creditors

11. The Debtors shall mail the Bar Date Package to their known creditors, and such mailing shall be made to the last known mailing address for each such creditor, as reflected in the Debtors' books and records at such time.

(Page 10): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

VI. Procedures for Providing Notice of the Bar Date

12. Pursuant to Bankruptcy Rule 2002(a)(7), within five (5) business days of the entry of the Bar Date Order, the Debtors will cause written notice of the Bar Dates, substantially in the form attached to the Motion as **Exhibit C** (the “**Bar Date Notice**”), and a Proof of Claim Form (collectively, the “**Bar Date Package**”) to be mailed via first-class mail to the following entities (the “**Notice Parties**”):

- a. the U.S. Trustee for District of New Jersey;
- b. the entities listed on the Debtors’ petitions as holding the largest unsecured claims (on a consolidated basis);
- c. counsel to any official committee of unsecured creditors formed in these chapter 11 cases;
- d. counsel to the Ad Hoc Group of Holders of Crown Capital Notes;
- e. all creditors and other known holders of claims against the Debtors as of the date of entry of the Bar Date Order, including all entities listed in the Schedules as holding claims against the Debtors;
- f. all entities that have requested notice of the proceedings in these chapter 11 cases pursuant to Bankruptcy Rule 2002 as of entry of the date of the Bar Date Order;
- g. all entities that have filed Proofs of Claim in these chapter 11 cases as of the date of entry of the Bar Date Order;
- h. all known non-Debtor equity and interest holders of the Debtors as of the Petition Date;
- i. all entities who are party to executory contracts and unexpired leases with the Debtors;
- j. all entities who are party to active litigation with the Debtors;

(Page 11): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

- k. all current and former employees (to the extent that contact information for former employees is available in the Debtors' records);
- l. all regulatory authorities that regulate the Debtors' businesses, including the U.S. Department of Housing and Urban Development;
- m. the Office of the Attorney General for the State of New Jersey and each of the states in which the Debtors conduct business;
- n. the District Director of the Internal Revenue Service for the District of New Jersey;
- o. all other taxing authorities for the jurisdictions in which the Debtors maintain or conduct business;
- p. all other entities listed on the Debtors' creditor matrix;
- q. the Office of the United States Attorney for the District of New Jersey
- r. the U.S. Department of Justice; and
- s. X-Caliber Funding, LLC.

13. The Debtors shall provide all known creditors listed in the Debtors' Schedules with a personalized Proof of Claim Form, which will set forth: (a) the identity of the Debtor against which the creditor's claim is scheduled; (b) the amount of the scheduled claim, if any; (c) whether the claim is listed as contingent, unliquidated, or disputed; and (d) whether the claim is listed as secured, unsecured priority, or unsecured non-priority. Each creditor shall have an opportunity to inspect the Proof of Claim Form provided by the Debtors and correct any information that is missing, incorrect, or incomplete. Additionally, any creditor may choose to submit a Proof of Claim on a different form as long as it is substantially similar to Official Form 410.

(Page 12): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

14. The Debtors shall also post the Proof of Claim Form and the Bar Date Notice on the Debtors' case website maintained by the Claims and Noticing Agent at: <https://www.veritaglobal.net/cbrm>.

15. After the initial mailing of the Bar Date Packages, the Debtors shall make supplemental mailings of notices or packages, including in the event that: (a) notices are returned by the post office with forwarding addresses; (b) certain parties acting on behalf of parties in interest decline to pass along notices to these parties and instead return their names and addresses to the Debtors for direct mailing, and (c) additional potential claimants become known as the result of the Bar Date mailing process. In this regard, the Debtors shall make supplemental mailings of the Bar Date Package in these and similar circumstances at any time up to seven (7) days in advance of the applicable Bar Date, and such claimants shall submit their Claims by the later of (a) the applicable Bar Date and (b) 5:00 p.m. prevailing Eastern Time on the date that is twenty-one (21) calendar days after such person or entity is re-served with the Bar Date Notice and Proof of Claim Forms; *provided* that, if the Debtors provide supplemental mailings in accordance with the foregoing on or before the date which falls twenty-one (21) days prior to the applicable Bar Date, claimants receiving such supplemental mailings must submit their Claims on or before the applicable Bar Date.

16. To the extent that any notices are returned as "return to sender" without a forwarding address, the Debtors shall not be required to mail additional notices to such creditors unless Debtors are aware of any additional alternate addressees for a creditor.

(Page 13): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

17. The Debtors shall cause notice of the Claims Bar Date and the Governmental Bar Date to be given by publication to creditors to whom notice by mail is impracticable, including creditors who are unknown or not reasonably ascertainable by the Debtors and creditors whose identities are known but whose addresses are unknown by the Debtors. Specifically, the Debtors shall cause the Bar Date Notice to be published as soon as reasonably practicable after entry of the Bar Date Order, modified for publication in substantially the form attached to the Motion as **Exhibit D** (the “**Publication Notice**”), on one occasion in the Newark Star Ledger, the Pittsburgh Post-Gazette, and The New Orleans Advocate, or similar publications in the prudent exercise of the Debtors’ business judgment.

18. Notice of the Bar Dates as set forth in this Bar Date Order and in the manner set forth herein (including, but not limited to, the Bar Date Notice, the Publication Notice, and any supplemental notices that the Debtors may send from time to time) constitutes adequate and sufficient notice of each of the Bar Dates and satisfies the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Bankruptcy Local Rules.

VII. Consequences of Failure to File a Proof of Claim

19. Any person or entity that is required, but fails, to file a Proof of Claim in accordance with the Bar Date Order on or before the applicable Bar Date shall be forever barred, estopped, and enjoined from asserting such claim against the Debtors and their chapter 11 estates (or filing a Proof of Claim with respect thereto), and the Debtors and their property and estates shall be forever discharged from any and all indebtedness or liability with respect to or arising from such

(Page 14): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

claim. Without limiting the foregoing sentence, any creditor asserting a claim entitled to priority pursuant to section 503(b)(9) of the Bankruptcy Code that fails to file a Proof of Claim in accordance with this Bar Date Order shall not be entitled to any priority treatment on account of such claim pursuant to section 503(b)(9) of the Bankruptcy Code. Such person or entity shall not be treated as a creditor with respect to such claim for any purpose in these chapter 11 cases.

20. Any such entity that is required, but fails, to file a Proof of Claim in accordance with the Bar Date Order on or before the applicable Bar Date shall be prohibited from voting to accept or reject any chapter 11 plan filed in these chapter 11 cases, participating in any distribution in these chapter 11 cases on account of such claim, or receiving further notices regarding such claim or these chapter 11 cases.

VIII. Miscellaneous

21. The Debtors and the Independent Fiduciary are authorized to take all actions necessary or appropriate to effectuate the relief granted pursuant to this Bar Date Order in accordance with the Motion.

22. This Bar Date Order shall be immediately effective and enforceable upon its entry.

23. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Bankruptcy Local Rules are satisfied by such notice.

24. All time periods set forth in this Bar Date Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

(Page 15): CBRM REALTY INC., *et al.*
Case No. 25-15343 (MBK)
Caption of Order: 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

25. Any relief granted to the Debtors pursuant to this Bar Date Order shall mean the Debtors, acting at the direction of the Independent Fiduciary.

26. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Bar Date Order.

Exhibit C

Proposed Bar Date Notice

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

Proposed 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

Proposed 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)

**NOTICE OF DEADLINES FOR THE FILING OF
PROOFS OF CLAIM, INCLUDING REQUESTS FOR PAYMENT
PURSUANT TO SECTION 503(B)(9) OF THE BANKRUPTCY CODE**

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 (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.

TO: ALL PERSONS AND ENTITIES WHO MAY HAVE CLAIMS AGAINST ANY OF THE FOLLOWING DEBTOR ENTITIES:

DEBTOR	CASE NO.
CBRM Realty Inc.	25-15343 (MBK)
Crown Capital Holdings LLC	25-15351 (MBK)
Kelly Hamilton Apts LLC	25-15352 (MBK)
Kelly Hamilton Apts MM LLC	25-15350 (MBK)
RH Chenault Creek LLC	25-15349 (MBK)
RH Copper Creek LLC	25-15346 (MBK)
RH Lakewind East LLC	25-15344 (MBK)
RH Windrun LLC	25-15345 (MBK)
RH New Orleans Holdings LLC	25-15348 (MBK)
RH New Orleans Holdings MM LLC	25-15347 (MBK)

PLEASE TAKE NOTICE THAT:

On May 19, 2025, (the “**Petition Date**”),² CBRM Realty Inc. and certain of its affiliates, as debtors and debtors in possession (collectively, the “**Debtors**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the District of New Jersey (the “**Court**”).

On [●], 2025 the Court entered an order [Docket No. [●]] the (“**Bar Date Order**”) establishing certain dates by which parties holding prepetition claims against the Debtors must file proofs of claim, including requests for payment pursuant to section 503(b)(9) of the Bankruptcy Code (“**Proofs of Claim**”).

As used in this Notice, the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons, estates, trusts, governmental units, and the Office of the United States Trustee for the District of New Jersey. In addition, the terms “persons” and “governmental units” are defined in sections 101(41) and 101(27) of the Bankruptcy Code, respectively.

As used in this Notice, the term “claim” means, as to or against the Debtors and in

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Bar Date Order.

accordance with section 101(5) of the Bankruptcy Code: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

I. THE BAR DATES

- a. **The Claims Bar Date.** Pursuant to the Bar Date Order, except as described below, all entities (except governmental units) holding claims against the Debtors (including any claim against any Debtor's officers, directors, or managers, in each case, in their respective capacities as such) that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date, including requests for payment pursuant to section 503(b)(9), must file a Proof of Claim by **July 28, 2025 at 5:00 p.m., prevailing Eastern Time.** Except as expressly set forth in this Notice and the Bar Date Order, the Claims Bar Date applies to all types of claims against the Debtors that arose prior to the Petition Date, including secured claims, unsecured priority claims, and unsecured non-priority claims.
- b. **The Governmental Bar Date.** Pursuant to the Bar Date Order, all governmental units holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date must file a Proof of Claim by **November 17, 2025, at 5:00 p.m., prevailing Eastern Time.** The Governmental Bar Date applies to all governmental units holding claims against the Debtors (whether secured, unsecured priority, or unsecured non-priority) that arose prior to the Petition Date, including governmental units with claims against the Debtors for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtors were a party.
- c. **The Rejection Damages Bar Date.** Pursuant to the Bar Date Order, all entities holding claims arising from the Debtors' rejection of executory contracts and unexpired leases must file a Proof of Claim by the Rejection Damages Bar Date (*i.e.*, by the date that is **the later of (i) the Claims Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m., prevailing Eastern Time, on the date that is thirty (30) days following entry of the order approving the rejection of the applicable executory contract or unexpired lease of the Debtors.**
- d. **The Amended Schedules Bar Date.** Pursuant to the Bar Date Order, all entities holding claims affected by the amendment to the Debtors' schedules of assets and liabilities and statements of financial affairs (collectively, the "**Schedules**") are required to file Proofs of Claim by the Amended Schedules Bar Date (*i.e.*, by the date that is **the later of (i) the Claims Bar Date or Governmental Bar Date, as applicable, and (ii) 5:00 p.m.,**

prevailing Eastern Time, on the date that is twenty-one (21) days after the date on which the Debtors provide notice of such amendment to the Schedules).

II. WHO MUST FILE A PROOF OF CLAIM

Except as otherwise set forth herein, the following entities holding claims against the Debtors that arose (or that are deemed to have arisen) prior to the Petition Date **must** file Proofs of Claim on or before the applicable Bar Date or any other applicable bar date set forth in the Bar Date Order, as applicable:

- a. any entity whose claim against a Debtor is not listed in the applicable Debtor's Schedules or is listed as "contingent," "unliquidated," or "disputed" if such entity desires to participate in these chapter 11 cases or share in any distribution in any of these chapter 11 cases;
- b. any entity that believes its claim is improperly classified in the Schedules or is listed in an incorrect amount and who desires to have its claim allowed under a different classification or in an amount different than set forth in the Schedules;
- c. any former or present full-time, part-time, salaried, or hourly employee asserting a claim based on a grievance against any Debtor to the extent grounds for such grievances arose on or prior to the Petition Date;
- d. any entity that believes its prepetition claim as listed in the Schedules is not an obligation of the specific Debtor against which the claim is listed and that desires to have its claim allowed against a Debtor other than that identified in the Schedules; and
- e. any entity that believes that its claim against a Debtor is or may be an administrative expense pursuant to Bankruptcy Code section 503(b)(9).

III. PARTIES WHO DO NOT NEED TO FILE PROOFS OF CLAIM

Certain parties are not required to file Proofs of Claim. The Court may, however, enter one or more separate orders at a later time requiring creditors to file Proofs of Claim for some kinds of the following claims and setting related deadlines. If the Court does enter such an order, you will receive notice of it. The following entities holding claims that would otherwise be subject to the Bar Dates, in the capacities described below, need **not** file Proofs of Claims:

- a. the U.S. Trustee, on account of claims for fees payable pursuant to 28 U.S.C. § 1930;
- b. any entity that already has filed a signed Proof of Claim against the applicable Debtor with the Claims and Noticing Agent in a form substantially similar to Official Form 410 with respect to the claim asserted therein;

- c. any entity whose claim is listed on the Schedules and: (i) is ***not*** listed in the Schedules as “disputed,” “contingent,” or “unliquidated;” (ii) such entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) such entity does not dispute the claim is an obligation of the specific Debtor against which the claim is listed in the Schedules;
- d. any entity whose claim has previously been allowed by a final order of this Court;
- e. any Debtor having a claim against another Debtor;
- f. any entity whose claim is solely against any non-Debtor affiliate;
- g. any entity whose claim has been paid in full by a Debtor pursuant to the Bankruptcy Code or in accordance with a Court order;
- h. any counterparty to an executory contract or unexpired lease whose contract or lease has been assumed or assumed and assigned by the Debtors, solely with respect to claims arising under such contract or lease;
- i. a current employee of the Debtors, if an order of this Court authorized the Debtors to honor such claim in the ordinary course of business as a wage, commission, or benefit; *provided* that a current or former employee must submit a Proof of Claim by the Claims Bar Date for all other claims arising before the Petition Date, including claims for wrongful termination, discrimination, harassment, hostile work environment, and/or retaliation;
- j. any current or former officer, manager, director, or employee for claims based on indemnification, contribution, or reimbursement;
- k. any entity holding a claim for which a separate deadline is fixed by this Court;
- l. any entity holding a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative expense; *provided* that any entity asserting a claim entitled to priority under section 503(b)(9) of the Bankruptcy Code must assert such claims by filing a request for payment or a Proof of Claim on or prior to the Claims Bar Date;
- m. any person or entity that is exempt from filing a Proof of Claim pursuant to an order of the Court in these chapter 11 cases;
- n. any entity providing debtor-in-possession financing and use of cash collateral approved by the Court;
- o. any entity holding an equity interest in any Debtor;

- p. DK1 Holdings LLC, CKD Funding LLC, and CKD Investor Penn LLC (in each case, in their respective capacities as prepetition secured lenders); and
- q. the Debtors' Independent Fiduciary.

IV. REQUIREMENTS FOR FILING PROOFS OF CLAIM

The following requirements shall apply with respect to filing and preparing each Proof of Claim:

- a. **Contents.** Each Proof of Claim must: (i) be written in legible English; (ii) include a claim amount denominated in United States dollars; (iii) conform substantially with the Proof of Claim Form provided by the Debtors or Official Form 410; and (iv) be signed by the claimant or by an authorized agent or legal representative of the claimant on behalf of the claimant, whether such signature is an electronic signature or is ink.
- b. **Section 503(b)(9) Claim.** Any Proof of Claim asserting a claim entitled to priority under section 503(b)(9) of the Bankruptcy Code must also: (i) include the value of the goods delivered to and received by the Debtors in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which such claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtors under section 546(c) of the Bankruptcy Code (if applicable).
- c. **Electronic Signatures Permitted.** Only original Proofs of Claim signed electronically or in ink by the claimant or an authorized agent or legal representative of the claimant may be deemed acceptable for purposes of claims administration. Copies of Proofs of Claim, or Proofs of Claim sent by facsimile or electronic mail, will not be accepted.
- d. **Identification of the Debtor Entity.** Each Proof of Claim must clearly identify the specific Debtor against which a claim is asserted, including the individual Debtor's case number. A Proof of Claim filed under the joint administration case number (Case No. 25-15343), or otherwise without identifying a specific Debtor, will be deemed as filed only against CBRM Realty Inc. A Proof of Claim that names a subsidiary Debtor but is submitted under Case No. 25-15343 will be treated as having been submitted against the subsidiary Debtor with a notation that a discrepancy in the submission exists.
- e. **Claim Against Multiple Debtor Entities.** Each Proof of Claim must state a claim against only one Debtor and clearly indicate the Debtor against which the claim is asserted. To the extent more than one Debtor is listed on the Proof of Claim, such claim will be treated as if filed only against CBRM Realty Inc. If the holder asserts separate Claims against different Debtors,

a separate Proof of Claim Form must be submitted with respect to each Claim; *provided* that a Claim that indicates it is filed against each Debtor by selecting the applicable Debtors at the top of the Proof of Claim Form shall be deemed to have been filed against each Debtor without the need to file additional Claims.

- f. ***Supporting Documentation.*** Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d). If, however, such documentation is voluminous, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available. Any supporting documentation that includes personally identifiable information should be redacted or hidden prior to submission.
- g. ***Timely Service.*** Each Proof of Claim must be filed or submitted, including supporting documentation, through any of the following methods: (i) electronic submission through the Electronic Case Filing, (ii) electronic submission using the interface available on the Claims and Noticing Agent's website at <https://www.veritaglobal.net/cbrm> or (iii) if submitted through non-electronic means, by U.S. mail or other hand delivery system, so as to be actually received by the Claims and Noticing Agent on or before the Claims Bar Date, the Governmental Bar Date, or other applicable Bar Date, as applicable, at the following address:

If by First-Class Mail, Hand Delivery, or Overnight Mail:

CBRM Realty Inc. Claims Processing Center
c/o KCC dba Verita
222 N Pacific Coast Highway, Suite 300
El Segundo, CA 90245

- h. ***Receipt of Service.*** Claimants submitting a Proof of Claim through non-electronic means wishing to receive acknowledgment that their Proofs of Claim were received by the Claims and Noticing Agent must submit (i) a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form sent to the Claims and Noticing Agent) and (ii) a self-addressed, stamped envelope.

V. CONSEQUENCES OF FAILING TO TIMELY FILE YOUR PROOF OF CLAIM

Pursuant to the Bar Date Order and in accordance with Bankruptcy Rule 3003(c)(2), if you or any party or entity who is required, but fails, to file a Proof of Claim in accordance with the Bar Date order on or before the applicable Bar Date, please be advised that:

- a. YOU WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING SUCH CLAIM AGAINST THE DEBTORS (OR FILING A PROOF OF CLAIM WITH RESPECT THERETO);

- b. THE DEBTORS AND THEIR PROPERTY SHALL BE FOREVER DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO OR ARISING FROM SUCH CLAIM;
- c. YOU WILL NOT RECEIVE ANY DISTRIBUTION IN THESE CHAPTER 11 CASES ON ACCOUNT OF THAT CLAIM; AND
- d. YOU WILL NOT BE PERMITTED TO VOTE ON ANY PLAN OR PLANS OF REORGANIZATION FOR THE DEBTORS ON ACCOUNT OF THESE BARRED CLAIMS OR RECEIVE FURTHER NOTICES REGARDING SUCH CLAIM.

VI. ADDITIONAL INFORMATION

Copies of the Proof of Claim, Bar Date Order, and other information regarding these chapter 11 cases are available for inspection free of charge on the Debtors' website at <https://www.veritaglobal.net/cbrm>. The Bar Date Order and other filings in these chapter 11 cases also are available for a fee at the Court's website at <http://ecf.nj.uscourts.gov>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>. Copies of the Bar Date Order and other documents filed in these cases also may be examined between the hours of 8:00 a.m. and 5:00 p.m., prevailing Eastern Time, Monday through Friday, at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the District of New Jersey, United States Courthouse, 402 East State Street, Trenton, New Jersey 08608.

<p>A HOLDER OF A POSSIBLE CLAIM AGAINST THE DEBTORS SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT COVERED BY THIS NOTICE, SUCH AS WHETHER THE HOLDER SHOULD FILE A PROF OF CLAIM.</p>

Exhibit D

Proposed Publication Notice

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

Proposed 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

Proposed 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 (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.

**NOTICE OF DEADLINES FOR THE FILING
OF PROOFS OF CLAIM, INCLUDING REQUESTS FOR
PAYMENTS UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE**

**THE CLAIMS BAR DATE IS:
JULY 28, 2025, AT 5:00 P.M. (PREVAILING EASTERN TIME)**

**THE GOVERNMENTAL CLAIMS BAR DATE IS:
NOVEMBER 17, 2025, AT 5:00 P.M. (PREVAILING EASTERN TIME)**

Deadlines for Filing Proofs of Claim. On [●], 2025, the United States Bankruptcy Court for the District of New Jersey (the “**Court**”) entered an order [Docket No. [●]] (the “**Bar Date Order**”) establishing certain deadlines for the filing of proofs of claim, including requests for payment under section 503(b)(9) of the Bankruptcy Code (collectively, “**Proofs of Claim**”), in these chapter 11 cases of the following debtors and debtors in possession (collectively, the “**Debtors**”):

DEBTOR	CASE NO.
CBRM Realty Inc.	25-15343 (MBK)
Crown Capital Holdings LLC	25-15351 (MBK)
Kelly Hamilton Apts LLC	25-15352 (MBK)
Kelly Hamilton Apts MM LLC	25-15350 (MBK)
RH Chenault Creek LLC	25-15349 (MBK)
RH Copper Creek LLC	25-15346 (MBK)
RH Lakewind East LLC	25-15344 (MBK)
RH Windrun LLC	25-15345 (MBK)
RH New Orleans Holdings LLC	25-15348 (MBK)
RH New Orleans Holdings MM LLC	25-15347 (MBK)

The Bar Dates. Pursuant to the Bar Date Order, **all** entities (except governmental units), including individuals, entities, estates, trusts, person or entity who is, or may be included in, or represented by, a purported class action, class suit, or similar representative action filed, or that may be filed, against the Debtors that have a claim or potential claim against the Debtors (including any claim against any Debtor’s officers, directors, or managers, in each case, in their respective

capacities as such) that arose prior to May 19, 2025, no matter how remote or contingent such right to payment or equitable remedy may be, **including** requests for payment under section 503(b)(9) of the Bankruptcy Code, MUST FILE A PROOF OF CLAIM on or before **July 28, 2025 at 5:00 p.m., prevailing Eastern Time** (the “**Claims Bar Date**”). Governmental entities that have a claim or potential claim against the Debtors that arose prior to May 19, 2025, no matter how remote or contingent such right to payment or equitable remedy may be, MUST FILE A PROOF OF CLAIM on or before **November 17, 2025, at 5:00 p.m., prevailing Eastern Time** (the “**Governmental Bar Date**”). All entities holding claims arising from the Debtors’ rejection of executory contracts and unexpired leases are required to file Proofs of Claim by **the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable, and (b) 5:00 p.m., prevailing Eastern Time, on the date that is thirty (30) days following entry of the order approving the Debtors’ rejection of the applicable executory contract or unexpired lease** (the “**Rejection Damages Bar Date**”). All entities holding claims affected by an amendment to the Debtors’ schedules of assets and liabilities and statements of financial affairs filed in these cases (collectively, the “**Schedules**”) are required to file Proofs of Claim **by the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable, and (b) 5:00 p.m., prevailing Eastern Time, on the date that is twenty-one (21) days from the date on which the Debtors provide notice of the amendment of the Schedules** (the “**Amended Schedules Bar Date**”).

ANY PERSON OR ENTITY WHO FAILS TO FILE A PROOF OF CLAIM, INCLUDING ANY REQUEST FOR PAYMENT UNDER SECTION 503(B)(9) OF THE BANKRUPTCY CODE ON OR BEFORE THE CLAIMS BAR DATE OR THE GOVERNMENTAL BAR DATE, AS APPLICABLE, SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSES OF VOTING ON AND RECEIVING A DISTRIBUTION UNDER ANY CHAPTER 11 PLAN.

Filing a Proof of Claim. Each Proof of Claim must be filed, including supporting documentation, by either (i) electronic submission through PACER (Public Access to Court Electronic Records at <http://ecf.nj.uscourts.gov>), (ii) electronic submission using the interface available on the Claims and Noticing Agent’s website at <https://www.veritaglobal.net/cbrm>, or (iii) if submitted through non-electronic means, by U.S. Mail or other hand delivery system, so as to be **actually received** by the Claims and Noticing Agent on or before the Claims Bar Date or the Governmental Bar Date, or any other applicable Bar Date, at the following addresses:

If by First-Class Mail, Hand Delivery, or Overnight Mail:

CBRM Realty Inc. Claims Processing Center
c/o KCC dba Verita
222 N Pacific Coast Highway, Suite 300
El Segundo, CA 90245

PROOFS OF CLAIM SUBMITTED BY FACSIMILE OR ELECTRONIC EMAIL WILL NOT BE ACCEPTED

Contents of Proofs of Claim. Each Proof of Claim must: (i) be written in legible English; (ii) include a claim amount denominated in United States dollars; (iii) conform substantially with the Proof of Claim Form provided by the Debtors or Official Form 410; and (iv) be signed by the

claimant or by an authorized agent or legal representative of the claimant on behalf of the claimant, whether such signature is an electronic signature or is ink.

Section 503(b)(9) Requests for Payment. Any Proof of Claim asserting a claim entitled to priority under section 503(b)(9) of the Bankruptcy Code must also: (i) include the value of the goods delivered to and received by the Debtors in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which such claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtors under section 546(c) of the Bankruptcy Code (if applicable).

Electronic Signatures Permitted. Only original Proofs of Claim signed electronically or in ink by the claimant or an authorized agent or legal representative of the claimant may be deemed acceptable for purposes of claims administration. Copies of Proofs of Claim, or Proofs of Claim sent by facsimile or electronic mail, will not be accepted.

Identification of the Debtor Entity. Each Proof of Claim must clearly identify the specific Debtor against which a claim is asserted, including the individual Debtor's case number. A Proof of Claim filed under the joint administration case number (Case No. 25-15343), or otherwise without identifying a specific Debtor, will be deemed as filed only against CBRM Realty Inc. A Proof of Claim that names a subsidiary Debtor but is submitted under Case No. 25-15343 will be treated as having been submitted against the subsidiary Debtor with a notation that a discrepancy in the submission exists.

Claim Against Multiple Debtor Entities. Each Proof of Claim must state a claim against only one Debtor and clearly indicate the Debtor against which the claim is asserted. To the extent more than one Debtor is listed on the Proof of Claim, such claim will be treated as if filed only against CBRM Realty Inc. If the holder asserts separate Claims against different Debtors, a separate Proof of Claim Form must be submitted with respect to each Claim; *provided* that a Claim that indicates it is filed against each Debtor by selecting the applicable Debtors at the top of the Proof of Claim Form shall be deemed to have been filed against each Debtor without the need to file additional Claims.

Supporting Documentation. Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d). If, however, such documentation is voluminous, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available. Any supporting documentation that includes personally identifiable information should be redacted or hidden prior to submission.

Timely Service. Each Proof of Claim must be filed or submitted, including supporting documentation, through any of the following methods: (i) electronic submission through the Electronic Case Filing, (ii) electronic submission using the interface available on the Claims and Noticing Agent's website at <https://www.veritaglobal.net/cbrm> or (iii) if submitted through non-electronic means, by U.S. mail or other hand delivery system, so as to be actually received by the Claims and Noticing Agent on or before the Claims Bar Date, the Governmental Bar Date, or other applicable Bar Date, as applicable, at the following address:

If by First-Class Mail, Hand Delivery, or Overnight Mail:

CBRM Realty Inc. Claims Processing Center
c/o KCC dba Verita
222 N Pacific Coast Highway, Suite 300
El Segundo, CA 90245

Receipt of Service. Claimants submitting a Proof of Claim through non-electronic means wishing to receive acknowledgment that their Proofs of Claim were received by the Claims and Noticing Agent must submit (i) a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form sent to the Claims and Noticing Agent) and (ii) a self-addressed, stamped envelope.

Additional Information. If you have any questions regarding the claims process and/or wish to obtain a copy of the Bar Date Notice, a proof of claim form or related documents you may do so by: (i) calling the Debtors' restructuring hotline at (866) 523-2941 (U.S./Canada) or +1 (781) 575-2044 (International); and/or (ii) visiting the Debtors' restructuring website at: <https://www.veritaglobal.net/cbrm>.