

**DEBEVOISE & PLIMPTON LLP**

M. Natasha Labovitz (*pro hac vice* pending)  
Sidney P. Levinson (*pro hac vice* pending)  
Elie J. Worenklein  
66 Hudson Boulevard  
New York, NY 10001  
Telephone: (212) 909-6000  
Facsimile: (212) 909-6836  
nlabovitz@debevoise.com  
slevinson@debevoise.com  
eworenklein@debevoise.com

*Proposed Co-Counsel to the Debtor and Debtor in Possession*

**COLE SCHOTZ P.C.**

Michael D. Sirota  
Warren A. Usatine  
Felice R. Yudkin  
Ryan T. Jareck  
Court Plaza North, 25 Main Street  
Hackensack, NJ 07601  
Telephone: (201) 489-3000  
Facsimile: (201) 489-1536  
msirota@coleschotz.com  
wusatine@coleschotz.com  
fyudkin@coleschotz.com  
rjareck@coleschotz.com

*Proposed Co-Counsel to the Debtor and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

CCA Construction, Inc.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-\_\_\_\_\_ (\_\_\_)

**DEBTOR’S APPLICATION FOR DESIGNATION AS COMPLEX CHAPTER 11 CASE**

The above-captioned debtor and debtor in possession (“CCA” or the “Debtor”) respectfully submits this application for designation as a complex chapter 11 case pursuant to the Court’s *General Order Governing Chapter 11 Complex Case Procedures*, dated August 1, 2024 (the “**Complex Case Order**”), and respectfully represents as follows:

1. This chapter 11 case qualifies as a complex chapter 11 case under the Complex Case Order because:

<sup>1</sup> The last four digits of CCA’s federal tax identification number are 4862. CCA’s service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.



**(select all applicable items)**

**X** The Debtor has total liabilities of more than \$50 million;

**X** The Debtor has total assets of more than \$50 million;

There are more than 1,000 creditors in this case;

The Debtor's case is of high public interest;

Other: Substantial explanation is required. (Attach additional sheets if necessary.)

This chapter 11 case would be administered most efficiently as a complex chapter 11 case.

**WHEREFORE**, CCA respectfully requests that the Court (a) enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein, and (b) grant such other and further relief as is just and proper.

Dated: December 22, 2024

*/s/ Michael D. Sirota*

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-and-

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**Exhibit A**

**Proposed Order**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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*Proposed Co-Counsel to the Debtor and Debtor in Possession*

In re:  
CCA Construction, Inc.,<sup>2</sup>  
  
Debtor.

Case No. 24-\_\_\_\_ (\_\_\_\_)

Chapter 11

Judge:

<sup>2</sup> The last four digits of CCA’s federal tax identification number are 4862. CCA’s service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

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Debtor: CCA Construction, Inc.

Case No.: 24-\_\_\_\_ (\_\_\_\_)

Caption of Order: Order Granting Chapter 11 Complex Case Designation

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**ORDER GRANTING  
CHAPTER 11 COMPLEX CASE DESIGNATION**

The relief set forth on the following pages, numbered two (2) through three (3), is

**ORDERED.**

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Debtor: CCA Construction, Inc.

Case No.: 24-\_\_\_\_ (\_\_\_\_)

Caption of Order: Order Granting Chapter 11 Complex Case Designation

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After review of the initial pleadings filed in this case, the Court concludes that this case meets the eligibility requirements of a Chapter 11 Complex Case under D.N.J. LBR 1002-2, and therefore

**IT IS ORDERED** that the request set forth in the *Debtor's Application for Designation as Chapter 11 Complex Case* pursuant to the Court's General Order Governing Chapter 11 Complex Case Procedures is **HEREBY GRANTED**; and

**IT IS FURTHER ORDERED** that the Chapter 11 Complex Case Procedures annexed to the Court's General Order Governing Chapter 11 Complex Case Procedures shall apply; and

**IT IS FURTHER ORDERED** that, within \_\_\_ days from the entry of this Order, the parties are directed to submit to chambers' email a proposed *Case Management Order* utilizing Local Form Chapter 11 Complex Case Management Order. The Case Management Order must attach as an exhibit the General Order with annexed Chapter 11 Complex Case Procedures. Provisions outside the scope of the General Order must be highlighted for the Court's review.