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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.,¹

Debtor.

Chapter 11

Case No. 24-_____ (___)

**DEBTOR’S APPLICATION FOR
EXPEDITED CONSIDERATION OF FIRST DAY MATTERS**

The above-captioned debtor and debtor in possession (“CCA” or the “Debtor”) respectfully submits this application for expedited consideration of first day matters pursuant to Rule 9013-5 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey and respectfully requests that a remote hearing on the following applications and motions be provided on an expedited basis:

¹ 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.



1. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Obtain Postpetition Financing; (II) Granting Liens and Superpriority Administrative Expense Claims; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief;
2. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue to Use its Bank Accounts and Maintain Existing Business Forms, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief;
3. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue its Prepetition Insurance Programs and (B) Pay All Prepetition Obligations Related Thereto, and (II) Granting Related Relief;
4. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay and Honor Certain Prepetition Wages, Benefits and Other Obligations, and (II) Granting Related Relief;
5. Debtor's Application for Entry of an Order Authorizing the Debtor to Appoint Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date; and
6. Debtor's Motion Seeking Entry of an Order Extending Time to File Schedules, Statements and Rule 2015.3 Financial Reports.

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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EXHIBIT A

Proposed Order

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

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

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In re:

CCA Construction, Inc.,¹

Debtor.

Case No. 24-____ (___)

Chapter 11

Judge:

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Debtor: CCA Construction, Inc.

Case No.: 24-____ (____)

Caption of Order: Order Regarding Debtor's Application for Expedited Consideration of First Day Matters

**ORDER REGARDING DEBTOR'S APPLICATION FOR
EXPEDITED CONSIDERATION OF FIRST DAY MATTERS**

The relief set forth on the following pages, numbered two (2) through four (4), is hereby

ORDERED.

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Debtor: CCA Construction, Inc.

Case No.: 24-____ (____)

Caption of Order: Order Regarding Debtor’s Application for Expedited Consideration of First Day Matters

After review of the *Debtor’s Application for Expedited Consideration of First Day Matters*, and for good cause shown;

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED** as set forth herein.
2. The following application and motions (collectively, the “**Motions**”) via Zoom are scheduled for a hearing before the Honorable Judge _____ on the date(s) and time(s) set forth below:

Motion		Hearing Date and Time
1.	Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Obtain Postpetition Financing; (II) Granting Liens and Superpriority Administrative Expense Claims; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief	_____, 2024 at __:____M
2.	Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue to Use its Bank Accounts and Maintain Existing Business Forms, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief	_____, 2024 at __:____M
3.	Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue its Prepetition Insurance Programs and (B) Pay All Prepetition Obligations Related Thereto, and (II) Granting Related Relief	_____, 2024 at __:____M
4.	Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay and Honor Certain Prepetition Wages, Benefits and Other Obligations, and (II) Granting Related Relief	_____, 2024 at __:____M
5.	Debtor’s Application for Entry of an Order Authorizing the Debtor to Appoint Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date	_____, 2024 at __:____M
6.	Debtor’s Motion for Entry of an Order Extending Time to File Schedules, Statements and Rule 2015.3 Financial Reports	_____, 2024 at __:____M

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Debtor: CCA Construction, Inc.

Case No.: 24-____ (___)

Caption of Order: Order Regarding Debtor's Application for Expedited Consideration of First Day Matters

3. A copy of this Order shall be served on all required parties pursuant to Local Rule 9013-5(f).

4. Objections and/or responses to the Motions, if any, may be made at the hearing pursuant to Local Rule 9013-5(d).

5. This Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.