

**DEBEVOISE & PLIMPTON LLP**

M. Natasha Labovitz (admitted *pro hac vice*)  
Erica S. Weisgerber (admitted *pro hac vice*)  
Molly Maass (admitted *pro hac vice*)  
Rory B. Heller (admitted *pro hac vice*)  
66 Hudson Boulevard  
New York, NY 10001  
Telephone: (212) 909-6000  
Facsimile: (212) 909-6836  
nlabovitz@debevoise.com  
eweisgerber@debevoise.com  
mbmaass@debevoise.com  
rbheller@debevoise.com

**COLE SCHOTZ P.C.**

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

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

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

In re:

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

Debtor.

Chapter 11

Case No. 24-22548 (CMG)

**DEBTOR’S JOINDER TO CSCEC HOLDING COMPANY INC.’S MOTION TO  
QUASH SUBPOENA ISSUED BY BML PROPERTIES LTD.**

The above-captioned debtor and debtor in possession (“CCA” or the “Debtor”) respectfully submits this joinder (the “Joinder”) to both the *Motion to Quash Subpoena Issued by BML Properties, Ltd.* [Docket No. 103] (the “Motion”) filed by non-Debtor CSCEC Holding Company, Inc. and the *Joinder of Non-Debtor Affiliates to Motion to Quash Subpoena Issued by BML Properties, Ltd.* [Docket No. 107] (the “Joinder of the Non-Debtor Affiliates”). CCA joins and incorporates herein the arguments made in the Motion and the Joinder of the Non-Debtor

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



Affiliates. As described in more detail in the Motion and the Joinder of the Non-Debtor Affiliates, among other things, BMLP's Rule 2004 subpoenas served on the non-Debtor Affiliates and CSCEC Holding Company, Inc. (or their registered agents) (the "**Subpoenas**") seek to impermissibly circumvent the discovery rules applicable to various pending proceedings, including the Baha Mar Litigation and the Bahamian Liquidation Proceedings. Such efforts are an impermissible use of Rule 2004 to seek an unfair advantage in the various pending proceedings against the Debtor and its affiliated defendants.

### **RESERVATION OF RIGHTS**

CCA reserves any and all rights to (a) amend or supplement this Joinder, and otherwise take any additional or further action with respect to the Subpoenas, and (b) respond to or otherwise address any claims, remedies, and/or defenses with respect to the Subpoenas which may be raised at any hearing scheduled to address the Motion.

### **CONCLUSION**

WHEREFORE, CCA respectfully requests that the Court enters an order, (i) quashing the Subpoenas, and (ii) granting such other and further relief against BMLP as is appropriate under the circumstances.

*[remainder of page intentionally left blank]*

DATED: February 18, 2025

Respectfully submitted,

By: /s/ Michael D. Sirota  
**COLE SCHOTZ P.C.**  
Michael D. Sirota  
Warren A. Usatine  
Felice R. Yudkin  
Ryan T. Jareck  
25 Main Street  
Hackensack, NJ, 07601  
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-and-

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rbheller@debevoise.com

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