

**GIBBONS P.C.**

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*Counsel to BML Properties, Ltd.*

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

<p>In re:</p> <p>CCA Construction, Inc.,<sup>1</sup></p> <p style="text-align: center;">Debtor.</p>	<p>(Hon. Christine M. Gravelle)</p> <p>Chapter 11</p> <p>Case No. 24-22548-CMG</p>
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**NOTICE OF WITHDRAWAL OF SUBPOENAS  
FOR RULE 2004 EXAMINATIONS WITHOUT PREJUDICE**

BML Properties, Ltd. (“BMLP”) hereby gives notice that it has withdrawn its Fed. R. Bankr. P. 2004 subpoenas issued to the parties identified in Appendix A hereto (collectively, the “CCA Non-Debtor Parties”), without prejudice to BMLP’s rights to (i) re-issue R2004 subpoenas to the CCA Non-Debtor Parties at a later date, subject to the rights of the Debtor, all targets of such discovery, and any other party with standing, to respond to, oppose, or otherwise challenge such discovery, and (ii) seek discovery from the CCA Non-Debtor Parties in the Baha Mar Litigation,<sup>2</sup>

<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.

<sup>2</sup> Capitalized terms not herein defined shall have the meanings ascribed to them in *CSCEC Holding Company Inc.’s Motion to Quash Subpoena Issued by BML Properties, Ltd.* [Dkt. No. 103].



the Bahamian Liquidation Proceedings, or any other non-bankruptcy proceeding, solely to the extent permitted by applicable law and subject to the rights of the Debtor, all targets of such discovery, and any other party with standing, to respond to, oppose, or otherwise challenge such discovery.

February 28, 2025  
Newark, New Jersey

**GIBBONS P.C.**

/s/ Brett S. Theisen

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**APPENDIX A**

1	2 Shore Drive North, LLC
2	537 Greenwich JV Mezz LLC
3	537 Greenwich New JV LLC
4	537 Greenwich Owner LLC
5	75 Park Lane, LLC
6	CCA Acquisitions LLC
7	CCA Civil – Daidone Electric
8	CCA Civil – Halmar International, LLC
9	CCA Civil – Plaza Construction JV, LLC
10	CCA Civil, Inc.
11	CCA Development, LLC
12	CCA Institute, Inc.
13	CCA International Group, Inc.
14	CCA Newport, Inc.
15	CCA Southeast, Inc.
16	CCA UniBuy, LLC
17	CSCEC Holding Company Inc.
18	KM/Plaza (FL Joint Venture)
19	Morristown Southgate, LLC
20	Neworld Development, Inc.
21	Park Shore Investors LLC
22	Plaza CM Services, LLC
23	Plaza Construction California LLC
24	Plaza Construction Holding Company LLC

25	Plaza Construction LLC
26	Plaza Construction Group Florida LLC
27	Plaza Contracting Company LLC
28	Plaza CW LLC
29	Plaza FL Contracting, LLC
30	Plaza Group Holdings, LLC
31	Plaza Schiavone (Joint Venture)
32	Plaza/Time Square Joint Venture
33	SC EB-5 Management LLC
34	SRE Development, LLC
35	Strategic Capital, LLC
36	Strategic EB-5 LLC
37	Strategic Greenwich Equity, LLC
38	Strategic Greenwich, LLC
39	Strategic Infrastructure, LLC
40	Strategic Park Shore, LLC
41	Shore Drive North Development, LLC
42	CCA South America, Inc.
43	China Construction America of South Carolina, Inc.