

DEBEVOISE & PLIMPTON LLP

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Co-Counsel to the Debtor and Debtor in Possession

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. 24-22548 (CMG)

**DECLARATION OF MICHAEL A. CURTO, ON BEHALF OF PROPOSED ORDINARY
COURSE PROFESSIONAL SQUIRE PATTON BOGGS (US) LLP**

I, Michael A. Curto, pursuant to Section 1746 of title 28 of the United States Code, hereby declare that the following is true to the best of my information, knowledge, and belief:

1. I am the Managing Partner of the Washington, DC office of Squire Patton Boggs (US) LLP located at 2550 M Street, NW, Washington, DC 20037 (the “**Firm**”).

¹ 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.



2422548250321000000000005

2. CCA Construction, Inc. (“CCA” or the “**Debtor**”) has requested that the Firm provide legal services to CCA, and the Firm has consented to provide such services.

3. The Firm may have in the past performed and may perform services in the future, in matters unrelated to CCA’s chapter 11 case, for persons that are parties-in-interest in these cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants, employees of CCA, or other parties-in-interest in these cases. The Firm does not perform services for any such persons in connection with these cases. In addition, the Firm does not have any relationship with any such persons, their attorneys, or accountants that would be adverse to CCA or its estate.

4. Neither I, nor any principal of or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from CCA with any other person other than the principals and regular employees of the Firm.

5. Neither I, nor any principal of, or professional employed by the Firm, insofar as I have been able to discover, holds or represents any interest adverse to CCA or its estate.

6. CCA owes the Firm \$12,585.25 for pre-petition services, the payment of which is subject to limitations contained in title 11 of the United States Code, 11 U.S.C. §§ 101-1532.²

7. As of the Petition Date, which was the date on which CCA commenced this chapter 11 case, the Firm was not party to an agreement for indemnification with CCA.

² While CCA received services along with other co-defendants, fees in connection with the BMLP litigation have historically been paid by co-defendant CCA Bahamas, Ltd. We understand that this amount is to be paid by CCA Bahamas, Ltd., not CCA, consistent with historical practice.

8. At any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

9. I, or a representative of the Firm, have read and am familiar with the requirements of the *Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business*.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of March, 2025 in
Washington, DC



Michael A. Curto

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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.,¹

Debtor.

Chapter 11

Case No. 24-22548 (CMG)

RETENTION QUESTIONNAIRE

**TO BE COMPLETED BY EACH ORDINARY COURSE PROFESSIONAL
EMPLOYED BY THE DEBTOR**

¹ 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.

Please return this Questionnaire to:

DEBEVOISE & PLIMPTON LLP

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If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

Squire Patton Boggs (US) LLP, 2550 M Street, NW,
Washington, DC 20037

2. Date of retention:

June 2013

3. Type of services provided (accounting, legal, etc.):

Legal

4. Brief description of services to be provided:

Provide advice in connection with CCA's appeal of the judgement in the BMLP litigation in New York State Court, and other general legal services as requested by CCA.

5. Arrangements for compensation (hourly, contingent, etc.):

Hourly

6. Prepetition claims against CCA held by the firm:

\$12,585.25²

(a) Average hourly rate (if applicable):

\$1,215.00

(b) Estimated average monthly compensation:

(1) An estimate of approximately \$15,000, which is based solely on current activities underway in connection with CCA's appeal of the judgement in the BMLP litigation in New York State court.

We understand that fees in connection with the appeal are to be paid by co-defendant, CCA Bahamas, Ltd., not CCA, consistent with historical practice.

(2) An estimate of approximately \$8, 000, for general legal services requested by CCA as the need arises.

7. Prepetition claims against CCA held individually by any member, associate, or professional employee of the firm:

N/A

8. Disclose the nature and provide a brief description of any interest adverse to CCA or to its estate with respect to the matters on which the above-named firm is to be employed:

This firm also represents CCA's co-defendants, CCA Bahamas, Ltd. And CSCEC (Bahamas), Ltd. In the BMLP litigation.

² While the CCA received services along with other co-defendants, fees in connection with the BMLP litigation has historically been paid by co-defendant CCA Bahamas, Ltd. We understand that this amount is to be paid by CCA Bahamas, Ltd., not CCA, consistent with historical practice.

9. Name and title of individual completing this Retention Questionnaire:

Michael A. Curto, Managing Partner, Washington, DC office

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and information.

Dated: March 19, 2025



Michael A. Curto
Managing Partner
Squire Patton Boggs (US) LLP