

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 SANDI M. RUSSELL, ON BEHALF OF PROPOSED ORDINARY
COURSE PROFESSIONAL, SMITH & DOWNEY, P.A.**

I, Sandi M. Russell, 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 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.



1. I am a partner of Smith & Downey, P.A., located at 320 E. Towsontown Blvd, Suite 1 East, Baltimore, Maryland 21286 (the “**Company**”).

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

3. The Company 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 these cases. As part of its customary practice, the Company 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 Company does not perform services for any such persons in connection with these cases. In addition, the Company 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 Company 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 Company.

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

6. CCA owes the Firm \$0.00 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.

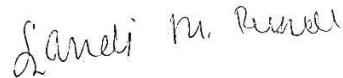
7. As of the Petition Date, which was the date on which CCA commenced this chapter 11 case, the Company was not party to an agreement for indemnification with CCA.

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

9. I, or a representative of the Company, 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 April 18, 2025 in Knoxville,
Tennessee, United States of America



Sandi M. Russell

DEBEVOISE & PLIMPTON LLP

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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:

Smith & Downey, P.A.
320 E. Towsontown Blvd., Suite 1 East, Baltimore, MD 21286.

2. Date of retention:

January 1, 2025

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

Legal

4. Brief description of services to be provided:

Employee benefit legal services related to the Debtor's 401(k) retirement plan

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

Hourly

6. Prepetition claims against CCA held by the firm:

N/A

- (a) Average hourly rate (if applicable):

\$510

- (b) Estimated average monthly compensation:

N/A

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:

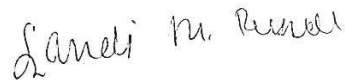
IRS audit of the 401(k) retirement plan

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

Sandi M. Russell, Partner

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: April 18, 2025



Sandi M. Russell, Partner
Smith & Downey, P.A.