

**DEBEVOISE & PLIMPTON LLP**

M. Natasha Labovitz (admitted *pro hac vice*)  
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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.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-22548 (CMG)

**DECLARATION OF STEPHEN P. YOUNGER, ON BEHALF OF PROPOSED  
ORDINARY COURSE PROFESSIONAL WITHERS BERGMAN LLP**

I, Stephen P. Younger, 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:

<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.



2422548250602000000000002

1. I am a Senior Counsel of Withers Bergman LLP, located at 430 Park Avenue, 10<sup>th</sup> Floor, New York, NY 10022 (the “**Company**”).

2. CCA Construction, Inc. (“**CCA**” or the “**Debtor**”) has requested that the Company provide appellate 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 in 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 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 a 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 29th day of May, 2025  
in New York, New York

  
STEPHEN P. YOUNGER

**DEBEVOISE & PLIMPTON LLP**

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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.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-22548 (CMG)

**RETENTION QUESTIONNAIRE**

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

**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:

Withers Bergman LLP

430 Park Avenue, 10<sup>th</sup> Floor

New York, NY 10022

2. Date of retention:

April 25, 2025

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

Legal

4. Brief description of services to be provided:

Work on a motion for leave to appeal

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

In accordance with the engagement letter with CCA and the other co-defendants, CCA is not responsible for Withers Bergman LLP's fees and expenses. Therefore, the firm does not anticipate any payments from CCA during the course of the chapter 11 case.

6. Prepetition claims against CCA held by the firm:

None

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

N/A

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- (b) Estimated average monthly compensation:

N/A

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

None

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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:

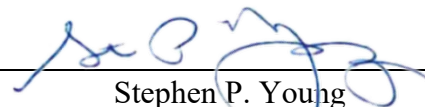
This firm also represents CCA's co-defendant affiliates, CCA Bahamas Ltd. and CSCEC (Bahamas), Ltd. in the same matters that it is representing CCA.

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

Stephen P. Younger, Senior Counsel

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: May 29, 2025

  
\_\_\_\_\_  
Stephen P. Young  
Senior Counsel  
Withers Bergman LLP