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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)

**SUPPLEMENTAL DECLARATION OF MICHAEL D. SIROTA, ESQ.
IN SUPPORT OF DEBTOR'S APPLICATION FOR ENTRY OF AN
ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION
OF COLE SCHOTZ P.C. AS BANKRUPTCY CO-COUNSEL TO
THE DEBTOR NUNC PRO TUNC TO THE PETITION DATE**

I, MICHAEL D. SIROTA, ESQ. pursuant to 28 U.S.C. § 1746, to the best of my knowledge and belief, and after reasonable inquiry, declare:

1. I am an attorney at law and shareholder of the law firm of Cole Schotz P.C. ("Cole Schotz"). Cole Schotz is a law firm of over 180 attorneys, having its principal offices at Court

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.



Plaza North, 25 Main Street, Hackensack, New Jersey 07601, with other offices in New York, Delaware, Maryland, Texas, and Florida. This Supplemental Declaration (the “Supplemental Declaration”) is submitted pursuant to sections 327, 329, and 504 of title 11 of the Bankruptcy Code, Bankruptcy Rule 2014(a), and Local Rule 2014-1 of the Local Bankruptcy Rules for the District of New Jersey.

2. I submit this Supplemental Declaration in further support of the *Debtor’s Application for Entry of an Order Authorizing the Employment and Retention of Cole Schotz P.C. as Bankruptcy Co-Counsel to the Debtor Nunc Pro Tunc to the Petition Date* [Docket No. 95] (the “Application”) and the *Order Approving the Employment and Retention of Cole Schotz P.C. as Co-Counsel to the Debtor Nunc Pro Tunc to the Petition Date* [Docket No. 112].² Cole Schotz has searched its electronic database of representations to parties in interest in this Chapter 11 Case. Certain connections were disclosed in a prior declaration Cole Schotz submitted in support of the Application. Application, Ex. A.

3. I am familiar with the matters set forth herein and make this Supplemental Declaration to supplement the disclosures set forth in my prior declaration in accordance with Bankruptcy Rules 2014(a) and 2016(b).

4. In light of the ongoing investigation of potential estate claims and causes of action, Cole Schotz hereby supplements its initial disclosures to disclose that non-Debtor affiliates Strategic Capital, LLC and Strategic Real Estate, LLC retained Cole Schotz in August 2018 in connection with their response to a subpoena. The last billing on the matter was in October 2019 and the attorney responsible for the engagement is no longer employed by Cole Schotz.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

5. Accordingly, based on the conflicts search conducted to date, to the best of my knowledge and insofar as I have been able to ascertain, I believe that Cole Schotz (i) is a “disinterested person” within the meaning of section 101(14) of the Bankruptcy Code, as required by section 327(a) of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtor’s estate and (ii) has no connection to the Debtor, its creditors or other parties in interest, except as disclosed in my prior declaration and herein.

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

Executed on June 12, 2025

/s/ Michael D. Sirota
MICHAEL D. SIROTA