

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET**

IN RE: CCA Construction, Inc. APPLICANT: Duane Morris LLP

CASE NO.: 24-22548 (CMG) CLIENT: Special Committee of Independent Directors

CHAPTER: 11 CASES FILED: December 22, 2024

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION UNDER PENALTY OF PERJURY, PURSUANT TO 28 U.S.C. SECTION 1746.

RETENTION ORDER(S) ATTACHED

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SECTION 1  
FEE SUMMARY

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MONTHLY FEE STATEMENT NO. 1  
(June 1, 2025 to June 30, 2025)

	<u>FEE</u>	<u>EXPENSES</u>
TOTAL PREVIOUS FEE REQUESTED	\$ <u>\$43,793.60</u>	\$ <u>\$573.10</u>
TOTAL FEES ALLOWED TO DATE:	\$ <u>\$0</u>	\$ <u>\$0</u>
TOTAL RETAINER (IF APPLICABLE)	\$ <u>\$0</u>	\$ <u>\$0</u>
TOTAL HOLDBACK (IF APPLICABLE)	\$ <u>\$10,948.40</u>	\$ <u>\$0</u>
TOTAL RECEIVED BY APPLICANT	\$ <u>\$0</u>	\$ <u>\$0</u>

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (OR YEARS OF PROFESSIONAL SERVICE)	HOURS	RATE	FEE
CCA Construction, Inc.				
1. Morris S. Bauer	1989(NY)/1990(NJ)	11.20	\$1,010.00	\$11,312.00
TOTALS		11.20		\$11,312.00

FEE TOTALS – PAGE 2	<u>\$11,312.00</u>
DISBURSEMENTS TOTALS – PAGE 3	<u>79.20</u>
TOTAL FEE APPLICATION	<u>\$11,391.20</u>
 TOTAL FEE REQUEST (80%)	 <u>\$9,049.60</u>
TOTAL DISBURSEMENTS REQUEST	<u>79.20</u>
TOTAL REQUEST THIS STATEMENT	<u>\$9,128.80</u>



SECTION II  
SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
a) <b>Asset Analysis and Recovery</b> Identification and review of potential assets including causes of action and non-litigation recoveries.	4.50	\$4,545.00
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work		
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.		
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) <b>Case Administration</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, lists of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.30	\$303.00
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to establish interim procedures.	2.70	\$2,727.00
i) <b>Fee/Employment Objections</b> Review of an objection to the employment and fee applications of others.		
j) <b>Financing</b> Matters under 361, 363, and 364 including cash collateral and secured claims; loan document analysis.		
k) <b>Litigation</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).		
l) <b>Meeting of Creditors</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' meetings.		
m) <b>Plan and Disclosure Statement</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	3.70	\$3,737.00
n) <b>Relief from Stay Proceedings</b> Matters relating to termination or continuation of automatic stay under 362.		

o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and bringing accounting current.		
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.		
v) <b>Valuation</b> Appraise or review appraisals of assets.		
w) <b>Travel Time</b>		\$
<b>SERVICE TOTALS:</b>	11.20	\$11,312.00

SECTION III  
SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
a) <b>Filing Fees</b> Payable to Clerk of Court	
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and description of manner calculated.	
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print	
d) <b>Fax</b> No. of Pages ___ Rate per Page <u>1.00</u> (Max. \$1.00/pg.)	
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges.	
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	
g) <b>Outside Reproduction Services</b> Including scanning services.	
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurint.	
i) <b>Court Reporting</b> Transcripts.	
j) <b>Travel</b> Mileage, tolls, airfare, parking.	\$79.20
k) <b>Courier &amp; Express Carries</b> Overnight and personal delivery.	
l) <b>Postage &amp; Overnight Mail</b>	
m) <b>Other (specify)</b>	
<b>DISBURSEMENTS TOTAL</b>	\$79.20

I certify under penalty of perjury that the above is true and correct.

Date: July 21, 2025

/s/ Morris S. Bauer  
SIGNATURE

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

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**DUANE MORRIS LLP**

Morris S. Bauer, Esq. (NJ Bar No. 039711990)

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*Counsel to the Special Committee of Independent  
Directors*

In Re:

CCA Construction, Inc.,

Debtor.<sup>1</sup>

Chapter 11

Case No. 24-22548

Judge: Hon. Christine M. Gravelle

**MONTHLY FEE STATEMENT OF DUANE MORRIS LLP, COUNSEL TO THE  
SPECIAL COMMITTEE OF INDEPENDENT DIRECTORS,  
FOR THE PERIOD OF JUNE 1, 2025 TO JUNE 30, 2025**

TO: THE HONORABLE CHRISTINE M. GRAVELLE  
UNITED STATES BANKRUPTCY JUDGE

The Monthly Fee Statement of Duane Morris LLP (“DM” or “Your Applicant”) respectfully shows unto Your Honor and alleges:

1. Your Applicants are attorneys of the State of New Jersey, duly admitted to practice before this Honorable Court.

2. Your Applicants further show that on December 22, 2024, CCA Construction, Inc. (the “Debtor” or “CCA”) filed a voluntary petition for reorganization pursuant to chapter 11 of the

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<sup>1</sup> The last four digits of CCA’s federal tax identification number are 4862. CCA’s service address for the purpose of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

United States Bankruptcy Code (the “Chapter 11 Case”), and at that time was continued in possession of its assets.

3. On May 28, 2025, an Order was entered in the Chapter 11 Case authorizing the retention of DM as Counsel to the Special Committee of Independent Directors. See Docket No. 343. Attached hereto as Exhibit “A” is a copy of the retention order.

4. On February 16, 2025, the *Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court* (the “Interim Compensation Order”) was entered in the Chapter 11 Case, which order sets for the Compensation Procedure for, *inter alia*. Professional to submit Monthly Fee Statements such that Professionals may be paid 80% of their monthly fees and 100% of their expenses. See Docket No. 178.

5. The services rendered by DM on behalf of the Special Committee of Independent Directors in conjunction with the Chapter 11 Case between June 1, 2025 and June 30, 2025, included the following, *inter alia*:

- a) Numerous conversations and correspondence with client regarding on-going investigation;
- b) Correspondence with BML representatives, coordinate meeting with BML and attendance at meeting;
- c) Review correspondence and proposed stipulation relating to Examiner request to increase budget amount;
- d) Weekly conversations with Cole Schotz representatives regarding on-going investigation; and
- e) Review documents pertinent to investigation.

6. Your Applicants show that annexed hereto as Exhibit “B” is a computer printout itemizing all services performed by members and associates of DM by task codes in accordance

with the United States Trustee guidelines for the period commencing June 1, 2025 through June 30, 2025. As shown on said exhibit, DM devoted in excess of 11.20 hours of services having a value of \$11,312.00 at this firm's then-existing billing rates. The names of the attorneys and the paralegals involved in this matter, their hourly billing rates, the time spend by each of them and the total fees resulting therefrom are as follows:

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (OR YEARS OF PROFESSIONAL SERVICE)	HOURS	RATE	FEE
<b>CCA Construction, Inc.</b>				
I. Morris S. Bauer	1989(NY)/1990(NJ)	11.20	\$1,010.00	\$11,312.00
<b>TOTALS</b>		11.20		\$11,312.00

7. Your Applicants further show that they have incurred out-of-pocket expenses in the sum of \$79.20, which are specifically set forth in the Fee Application Cover Sheet submitted simultaneously herewith.

8. Your Applicants further show that on June 24, 2025, Your Applicants filed their First Monthly Fee Statement requesting fees in the amount of \$43,793.60 (80% of \$54,742.00) and reimbursement of expenses in the amount of \$573.10. See Docket No. 385. No objections were filed to the First Monthly Fee Statement. See Docket No. 403. As of this date, Your Applicants have not received payment.

9. Your Applicants certify that the Special Committee of Independent Directors will have received and will have ample opportunity to review the within application for compensation and reimbursement of expenses.

**WHEREFORE**, subject to no objections being interposed by the objection deadline, Your Applicants will respectfully request that the Special Committee of Independent Directors remit thereto 80% of the requested fees and 100% of their out-of-pocket expenses in the amounts of \$9,049.60 and \$79.20, respectively, in accordance with the Interim Compensation Order.

DUANE MORRIS LLP.  
Attorneys for Special Committee of  
Independent Directors

Dated: July 21, 2025

By: /s/ Morris S. Bauer  
MORRIS S. BAUER



**EXHIBIT A**

**Duane Morris Retention Order**



Order Filed on May 28, 2025  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
<b>DUANE MORRIS LLP</b> Morris S. Bauer, Esq. (NJ Bar No. 039711990) 200 Campus Drive, Suite 300 Florham Park, New Jersey 07932-1007 Telephone: (973) 424-2037 Facsimile: (973) 556-1380 E-mail: <a href="mailto:MSBauer@duanemorris.com">MSBauer@duanemorris.com</a>	
<i>Proposed Counsel to the Special Committee of Independent Directors</i>	
In Re:  CCA Construction, Inc.,  <div style="text-align: center;">Debtor.<sup>1</sup></div>	Chapter 11  Case No. 24-22548  Judge: Hon. Christine M. Gravelle

**ORDER AUTHORIZING RETENTION OF DUANE MORRIS LLP AS ATTORNEYS  
FOR THE SPECIAL COMMITTEE OF INDEPENDENT DIRECTORS  
EFFECTIVE APRIL 9, 2025**

The relief set forth on the following page, numbered two (2), is hereby **ORDERED**.

**DATED: May 28, 2025**

  
 Honorable Christine M. Gravelle, Chief Judge  
 United States Bankruptcy Judge

<sup>1</sup> The last four digits of CCA's federal tax identification number are 4862. CCA's service address for the purpose of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

(Page 2)

Debtor: CCA Construction, Inc.

Case No. 24-22548 (CMG)

Caption of Order: Order Authorizing Retention of Duane Morris LLP as Attorneys for the Special Committee of Independent Directors Effective April 9, 2025

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Upon the applicant's request for authorization to retain Duane Morris LLP ("DM") as attorneys for the committee of independent directors of the board of CCA Construction, Inc. (the "Debtor"), it is hereby ORDERED:

1. The applicant is authorized to retain DM with respect to all matters for which the Special Committee has been delegated authority, including with respect to the Special Committee's oversight of the investigation of potential claims or causes of action of the Debtor, if any, against third parties and related matters in the Chapter 11 Case as the representation proceeds (the "Matter"), at the direction of and with the approval of the Special Committee. DM shall use its best efforts to avoid duplication of services provided by any of the other professionals retained in the Chapter 11 Case.

The professional's address is: Duane Morris LLP  
200 Campus Drive, Suite 300  
Florham Park, NJ 07932-1007  
Attn: Morris S. Bauer

2. Compensation will be paid by the Debtor in such amounts as may be allowed by the Court on proper application(s).
3. The effective date of retention is the April 9, 2025.

**EXHIBIT B**

**Detailed Time Records**

Timekeeper Name	Hours	Fees	Work Date	Task Code	Narrative
<b>CASE ADMINISTRATION:</b>					
BAUER, MORRIS S.	0.10	101.00	6/23/25	B110	REVIEW EMAILS ON EXAMINER REQUEST TO INCREASE BUDGET
BAUER, MORRIS S.	0.20	202.00	6/30/25	B110	REVIEW FOLLOW UP EMAILS WITH D. HARRIS ON VARIOUS ITEMS, REVIEW CLIENT EMAILS, SEND EMAIL RESPONSE
<b>CASE ADMINISTRATION TOTAL:</b>	<b>0.30</b>	<b>303.00</b>			
<b>ASSET ANALYSIS AND RECOVERY:</b>					
BAUER, MORRIS S.	0.50	505.00	6/3/25	B120	ATTEND CONFERENCE CALL WITH COLE RE: INVESTIGATION
BAUER, MORRIS S.	0.40	404.00	6/3/25	B120	REVIEW MINUTES, COMMENCE REVIEW OF INTERVIEW INFO, COORDINATE RESCHEDULING CONFERENCE CALL
BAUER, MORRIS S.	0.20	202.00	6/5/25	B120	REVIEW EMAIL FROM B. THEISEN RE: LETTER ON BML INVESTIGATION ISSUES
BAUER, MORRIS S.	0.70	707.00	6/10/25	B120	PREPARE FOR CONFERENCE CALL AND ATTEND COLE CONFERENCE CALL; REVIEW SUBSEQUENT EMAILS
BAUER, MORRIS S.	0.20	202.00	6/12/25	B120	REVIEW INFORMATION ON CERTAIN LEGAL ISSUES
BAUER, MORRIS S.	0.20	202.00	6/16/25	B120	REVIEW EMAILS TO RESCHEDULE WEEKLY CALL
BAUER, MORRIS S.	0.60	606.00	6/17/25	B120	REVIEW MEETING MINUTES (0.1); ATTEND WEEKLY COLE CONFERENCE CALL (0.5)
BAUER, MORRIS S.	1.10	1,111.00	6/20/25	B120	CONFERENCE CALL WITH DEBEVOISE, COLE, BDO AND CLIENT RE: ADDRESSING ITEMS DISCUSSED WITH BML
BAUER, MORRIS S.	0.10	101.00	6/23/25	B120	REVIEW EMAILS AND SEND EMAILS TO RESCHEDULE CALL
BAUER, MORRIS S.	0.20	202.00	6/24/25	B120	PRELIMINARY REVIEW OF DRAFT DOCUMENT
BAUER, MORRIS S.	0.30	303.00	6/26/25	B120	TELEPHONE CALL TO E. ABRAMS RE: STATUS, INVESTIGATION

<b>ASSET ANALYSIS AND RECOVERY TOTAL:</b>	<b>4.50</b>	<b>4,545.00</b>			
<b>FEE/EMPLOYMENT APPLICATIONS:</b>					
BAUER, MORRIS S.	0.20	202.00	6/2/25	B160	REVIEW ENTERED EXAMINER SCOPE ORDER AND SEND EMAIL TO CLIENT
BAUER, MORRIS S.	0.10	101.00	6/12/25	B160	REVIEW EMAIL FROM D. HARRIS RE: COLE SUPPLEMENTAL DECLARATION
BAUER, MORRIS S.	0.10	101.00	6/13/25	B160	REVIEW EMAILS ON REQUEST BY EXAMINER TO INCREASE BUDGET AND SEND EMAIL TO CLIENT
BAUER, MORRIS S.	0.50	505.00	6/16/25	B160	PARTICIPATE IN CALL TO DISCUSS EXAMINER REQUEST TO INCREASE BUDGET
BAUER, MORRIS S.	0.70	707.00	6/23/25	B160	PREPARE IN DRAFT DM MONTHLY FEE STATEMENT FOR APRIL AND MAY 2025
BAUER, MORRIS S.	0.20	202.00	6/24/25	B160	COORDINATE FILING AND SERVICE OF MONTHLY FEE STATEMENT
BAUER, MORRIS S.	0.10	101.00	6/25/25	B160	REVIEW EMAIL FROM D. HARRIS RE: PROPOSED NOTICE REGARDING EXAMINER BUDGET; SEND EMAIL TO CLIENT
BAUER, MORRIS S.	0.50	505.00	6/27/25	B160	EXAMINER BUDGET AND TELEPHONE CALL TO/FROM D. HARRIS (0.2); SEND EMAIL TO/FROM CLIENT (0.1); SEND EMAIL TO D. HARRIS (0.2) RE: COMMENT AND
BAUER, MORRIS S.	0.30	303.00	6/30/25	B160	REVIEW EMAIL FROM D. HARRIS RE: REVISED STIPULATION AND PROPOSED APPLICATION (0.2); SEND EMAIL TO D. HARRIS (0.1) RE: COMMENTS
<b>FEE/EMPLOYMENT APPLICATIONS TOTAL:</b>	<b>2.70</b>	<b>2,727.00</b>			
<b>PLAN/DISCLOSURE STATEMENT:</b>					
BAUER, MORRIS S.	0.10	101.00	6/4/25	B320	REVIEW EMAIL FROM B. THEISEN RE: REQUEST CONFERENCE CALL ON PLAN AND FORWARD TO CLIENT
BAUER, MORRIS S.	0.20	202.00	6/5/25	B320	REVIEW AND CORRESPOND WITH CLIENT RE: POSSIBLE MEETING WITH BML'S COUNSEL ON PLAN
BAUER, MORRIS S.	0.30	303.00	6/5/25	B320	REVIEW EMAILS AND SEND EMAIL TO BML ATTYS TO COORDINATE MEETING TO DISCUSS PLAN
BAUER, MORRIS S.	0.20	202.00	6/6/25	B320	SEND EMAIL TO B. THEISEN RE: AVAILABLE DATE FOR MEETING; SEND EMAIL TO CLIENT
BAUER, MORRIS S.	0.30	303.00	6/9/25	B320	SEND EMAILS TO/REVIEW EMAILS FROM VARIOUS PARTIES RE: SCHEDULING MEETING TO DISCUSS PLAN

BAUER, MORRIS S.	0.20	202.00	6/16/25	B320	COORDINATE MEETING FOR PLAN DISCUSSIONS WITH BML
BAUER, MORRIS S.	1.70	1,717.00	6/17/25	B320	UPCOMING MEETING (0.1); REVIEW EMAILS FROM/SEND EMAILS TO COLE (0.1) RE: ATTENDEES; TELEPHONE CALL FROM M. SIROTA (0.2) RE:
BAUER, MORRIS S.	0.10	101.00	6/18/25	B320	REVIEW EMAILS FROM VARIOUS PERSONS TO SCHEDULE CONFERENCE CALL; PROVIDE EMAIL REPLY ON AVAILABILITY
BAUER, MORRIS S.	0.60	606.00	6/24/25	B320	WEEKLY CALL WITH COLE TEAM
<b>PLAN/DISCLOSURE STATEMENT TOTAL:</b>	<b>3.70</b>	<b>3,737.00</b>			
	<b>11.20</b>	<b>11,312.00</b>			

Costs	Cost Code	Cost Code Description
79.2	0006-H	TRAVEL - LOCAL
0	0038-S	PACER FEDERAL DOCKET COSTS
0	0038-S	PACER FEDERAL DOCKET COSTS
0	0038-S	PACER FEDERAL DOCKET COSTS
79.2		