

**Fill in this information to identify the case:**Debtor CCA Construction, Inc.United States Bankruptcy Court for the: \_\_\_\_\_ District of New Jersey  
(State)Case number 24-22548**Modified Official Form 410  
Proof of Claim****12/24**

**Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.**

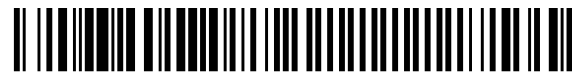
**Filers must leave out or redact** information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

**Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.**

**Part 1: Identify the Claim**

1. Who is the current creditor?	<u>Morristown Southgate LLC</u> Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b> <u>Morristown Southgate LLC</u> <u>Christopher M. Lambe, Esq.</u> <u>1000</u> <u>Wilmington, DE 19801</u>  Contact phone _____ Contact email <u>clambe@ycst.com</u>  Uniform claim identifier (if you use one): _____	<b>Where should payments to the creditor be sent? (if different)</b>  Contact phone _____ Contact email _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	



**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

<b>6. Do you have any number you use to identify the debtor?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor:   __ __ __ __
<b>7. How much is the claim?</b> \$ <u>0.00</u>	<b>Does this amount include interest or other charges?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
<b>8. What is the basis of the claim?</b>	<p>Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.</p> <p>Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).</p> <p>Limit disclosing information that is entitled to privacy, such as health care information.</p> <p><u>See summary page</u></p>
<b>9. Is all or part of the claim secured?</b>	<div><input checked="" type="checkbox"/> No</div> <div><input type="checkbox"/> Yes. The claim is secured by a lien on property. <b>Nature or property:</b> <div><input type="checkbox"/> Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i>.</div><div><input type="checkbox"/> Motor vehicle</div><div><input type="checkbox"/> Other. Describe: _____</div></div> <div><b>Basis for perfection:</b> _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)</div> <div><b>Value of property:</b> \$ _____ <b>Amount of the claim that is secured:</b> \$ _____ <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)</div> <div><b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____</div> <div><b>Annual Interest Rate</b> (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable</div>
<b>10. Is this claim based on a lease?</b>	<div><input type="checkbox"/> No</div> <div><input checked="" type="checkbox"/> Yes. <b>Amount necessary to cure any default as of the date of the petition.</b>   \$ <u>0.00</u></div>
<b>11. Is this claim subject to a right of setoff?</b>	<div><input checked="" type="checkbox"/> No</div> <div><input type="checkbox"/> Yes. Identify the property: _____</div>



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check all that apply:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Amount entitled to priority

\$ \_\_\_\_\_

☐ Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ \_\_\_\_\_

☐ Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ \_\_\_\_\_

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ \_\_\_\_\_

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ \_\_\_\_\_

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

☒ No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

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

Executed on date 07/30/2025  
MM / DD / YYYY

/s/Christopher M. Lambe, Esq.  
Signature

Print the name of the person who is completing and signing this claim:

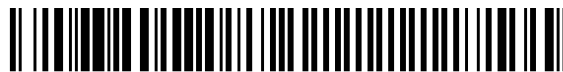
Name Christopher M. Lambe, Esq.  
First name Middle name Last name

Title Attorney

Company Young Conaway Stargatt Taylor, LLP  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address \_\_\_\_\_

Contact phone \_\_\_\_\_ Email \_\_\_\_\_



# Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (866) 506-4002 | International +1 (781) 575-2094

<b>Debtor:</b> 24-22548 - CCA Construction, Inc. <b>District:</b> District of New Jersey, Trenton Division		
<b>Creditor:</b> Morristown Southgate LLC Christopher M. Lambe, Esq. 1000  Wilmington, DE, 19801 <b>Phone:</b> <b>Phone 2:</b> <b>Fax:</b> <b>Email:</b> clambe@ycst.com	<b>Has Supporting Documentation:</b> Yes, supporting documentation successfully uploaded <b>Related Document Statement:</b>	
	<b>Has Related Claim:</b> No <b>Related Claim Filed By:</b>	
	<b>Filing Party:</b> Authorized agent	
	<b>Other Names Used with Debtor:</b>	
<b>Amends Claim:</b> No <b>Acquired Claim:</b> No		
<b>Basis of Claim:</b> Lease for Nonresidential Real Property Located at 445 South Street, Suite 310, Morristown, NJ	<b>Last 4 Digits:</b> No	<b>Uniform Claim Identifier:</b>
<b>Total Amount of Claim:</b> 0.00	<b>Includes Interest or Charges:</b> No	
<b>Has Priority Claim:</b> No	<b>Priority Under:</b>	
<b>Has Secured Claim:</b> No <b>Amount of 503(b)(9):</b> No <b>Based on Lease:</b> Yes, 0.00 <b>Subject to Right of Setoff:</b> No	<b>Nature of Secured Amount:</b> <b>Value of Property:</b> <b>Annual Interest Rate:</b> <b>Arrearage Amount:</b> <b>Basis for Perfection:</b> <b>Amount Unsecured:</b>	
<b>Submitted By:</b> Christopher M. Lambe, Esq. on 30-Jul-2025 2:05:27 p.m. Pacific Time <b>Title:</b> Attorney <b>Company:</b> Young Conaway Stargatt Taylor, LLP		

**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)

**ADDENDUM TO PROOF OF CLAIM  
FILED BY MORRISTOWN SOUTHGATE, LLC**

1. Morristown Southgate LLC (the “Claimant”) hereby submits this addendum (this “Addendum”) to the Claimant’s proof of claim (the “Proof of Claim”) filed against CCA Construction, Inc. (the “Debtor”) in its chapter 11 case pending in the United States Bankruptcy Court for the District of New Jersey (the “Court”). This Addendum is attached to, incorporated by reference in, and constitutes an integral part of, the Claimant’s Proof of Claim. In support of its Proof of Claim, the Claimant states as follows:

**Basis for Claim**

2. The Claimant is party to that certain lease by and between the Debtor and the Claimant for nonresidential real property located at 445 South Street, Suite 310, Morristown, New Jersey (the “Lease”). The Debtor possesses a copy of the Lease. Due to the confidential nature of the Lease, it is not attached hereto.<sup>2</sup>

3. While the Claimant does not currently have knowledge of any claims or causes of action against the Debtor, the Claimant files the Proof of Claim out of an abundance of caution to reserve its rights against the Debtor.

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<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.

<sup>2</sup> The Claimant will provide a copy of the Lease to the Court if so requested.

4. The Proof of Claim further includes all claims of the Claimant against the Debtor on account of all rights, claims, and causes of action against the Debtor, of any nature, whether contingent or non-contingent, liquidated or unliquidated, or otherwise which arise under the Lease, and actions or inactions in regard thereto.

5. The Proof of Claim further includes all claims of the Claimant against the Debtor on account of all rights, claims, and causes of action against the Debtor, of any nature, whether contingent or non-contingent, liquidated or unliquidated, or otherwise which may arise other than in the context of the Lease, and actions or inactions in regard thereto.

6. The filing of the Proof of Claim is not and should not be construed to be: (i) a waiver or release of the Claimant's rights against any other entity or person liable for all or part of any claim described herein; (ii) a consent by the Claimant to the treatment of any non-core claim against it as a core claim; (iii) a consent by the Claimant to the jurisdiction of the Court with respect to any proceeding commenced in this case; (iv) a waiver of the right to withdraw the reference with respect to the subject matter of these claims, any objection or other proceedings commenced with respect thereto, or any other proceedings commenced in this case against or otherwise involving the Claimant; (v) a waiver of any right to subordination in favor of the Claimant; (vi) an election of remedy which waives or otherwise affects any other remedy of the Claimant; or (vii) a waiver of any of the Claimant's rights, claims, and/or assignments under 11 U.S.C. § 365 with regard to the Lease.

#### **Reservations of Rights and Claims**

7. The Proof of Claim does not encompass claims or rights that the Claimant may have that arise after the Petition Date and that are entitled to an administrative expense priority, including diminution in value claims or expenses that constitute administrative claims, and the

Claimant expressly reserves its right to file and assert such claims and rights at the appropriate time.

8. The Proof of Claim and this Addendum are subject to future adjustments from time to time by the Claimant, and nothing included in, or omitted from, the Proof of Claim or this Addendum shall impair, prejudice, waive, or otherwise affect the rights of the Claimant with respect to the Proof of Claim. Without limitation, the Claimant reserves any and all rights to: (i) seek any and all appropriate relief under title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”), or otherwise with respect to the Proof of Claim; (ii) file additional or other proofs of claim; (iii) assert any and all defenses and rights of setoff and recoupment against the Debtor; and (iv) amend, supplement, or otherwise modify the Proof of Claim and/or this Addendum.

9. The filing of the Proof of Claim and this Addendum is not intended nor shall be deemed to be a waiver or limitation of any of the rights (including the right to a jury trial), defaults under the Lease, obligations, or defenses of the Claimant, all of which are fully preserved. The Proof of Claim is not intended as a waiver or election of remedies.

10. The Claimant does not waive any right to any assets, security, or collateral held by or for it or any right to claim an interest in specific assets or any other rights or causes of action, including, without limitation, the right to setoff, that the Claimant has or may have against the Debtor or any other person or persons, and expressly reserves such rights.

11. The Claimant also reserves the right to file additional proofs of claim or to amend or supplement the Proof of Claim in any respect, including, without limitation, by specifying the dollar amount of any part of the claim that is not stated in specific amounts herein, if and when available.

12. The Claimant reserves the right to assert that all or any part of its claim is a secured claim, or is an administrative expense entitled to first priority under Sections 507(a)(2) and 507(b) of the Bankruptcy Code, or Section 503 of the Bankruptcy Code, or under any other applicable law or otherwise.

13. This submission is without prejudice to all rights of the Claimant, which are hereby reserved.