

GIBBONS P.C.

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Counsel to BML Properties, Ltd.

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

In re:

CCA Construction, Inc.,¹

Debtor.

Chapter 11

Case No. 24-22548 (CMG)

APPLICATION FOR ADMISSION OF ERIC WINSTON PRO HAC VICE

Brett S. Theisen, a member of the bar of this Court, hereby moves for the entry of an Order granting the admission *pro hac vice* of Eric Winston of Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), to practice before this Court in connection with the above-captioned case. This application (the “Application”) is submitted pursuant to Civil Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey. In support of the Application, the undersigned represents as follows:

1. I am an attorney at law of the State of New Jersey and admitted to practice in the United States District Court for the District of New Jersey, and a director of the law firm Gibbons

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



P.C., which maintains an address of One Gateway Center, Newark, New Jersey 07102. Quinn Emanuel has been retained to serve as co-counsel, with Gibbons, for BML Properties Ltd. (“BMLP”) in connection with the above-captioned case.

2. Mr. Winston is an attorney at law and a partner at the Quinn Emanuel firm, which maintains an office at 865 S. Figueroa Street, 10th Floor, Los Angeles, California 90017.

3. Attached hereto is the Certification of Mr. Winston in which he certifies that he is, and has been, a member in good standing of the bars of the State of California since 1999, the United States District Court for the Central, Eastern, Northern and Southern Districts of California since 1999, the United States Court of Appeals for the Ninth and Tenth Circuits since 1999, the United States Court of Appeals for the Third Circuit since 2001, the United States Court of Appeals for the Eleventh Circuit since 2010, the United States Court of Appeals for the Second Circuit since 2013, and the United States Court of Appeals for the Fifth Circuit since 2022.

4. Additionally, Mr. Winston certifies that he is, and has remained, a member of good standing of said bar at all times, that no disciplinary proceedings are pending against him in any jurisdiction and no discipline has previously been imposed on him in any jurisdiction.

5. Mr. Winston is familiar with the circumstances surrounding the above-captioned proceedings and applicable law, and his presence will serve the best interests of BMLP.

WHEREFORE, applicant respectfully requests the entry of the Order submitted herewith approving the admission, *pro hac vice*, of Eric Winston to represent BMLP as co-counsel in the above-captioned case.

August 25, 2025
Newark, New Jersey

GIBBONS P.C.

/s/ Brett S. Theisen

Robert K. Malone, Esq.

Brett S. Theisen, Esq.

Christopher P. Anton, Esq.

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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)

**CERTIFICATION OF ERIC WINSTON IN SUPPORT
OF APPLICATION FOR ADMISSION *PRO HAC VICE***

ERIC WINSTON, of full age, under penalty of perjury, hereby certifies, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney at law and a partner at the law firm Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), which maintains an office at 865 S. Figueroa Street, 10th Floor, Los Angeles, California 90017

2. I make this Certification in support of my application (the “Application”) pursuant to Civil Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District

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of New Jersey (together, the “Local Rules”), for admission to this Court *pro hac vice*. Gibbons P.C. and Quinn Emanuel have been retained to serve as co-counsel for BML Properties Ltd. (“BMLP”) in connection with the above-captioned case.

6. I am, and have been, a member of good standing of the bars of the State of California since 1999, the United States District Court for the Central, Eastern, Northern and Southern Districts of California since 1999, the United States Court of Appeals for the Ninth and Tenth Circuits since 1999, the United States Court of Appeals for the Third Circuit since 2001, the United States Court of Appeals for the Eleventh Circuit since 2010, the United States Court of Appeals for the Second Circuit since 2013, and the United States Court of Appeals for the Fifth Circuit since 2022.

3. I am, and have remained, a member of good standing of said bars at all times. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

4. I am familiar with the circumstances surrounding the above-captioned proceedings and applicable law, and my presence will serve the best interests of BMLP.

5. I am not admitted to practice law in the State of New Jersey and, therefore, believe it is necessary for me to seek *pro hac vice* admission in this proceeding.

6. If admitted *pro hac vice*, I agree to abide by the Local Rules, and to make the payments to the Clerk of the United States Court for the District of New Jersey and the New Jersey Lawyer’s Fund for Client Protection as provided in Civil Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey.

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

Executed on: August 25, 2025

/s/ Eric Winston
Eric Winston, Esq.

GIBBONS P.C.

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

In re:

CCA Construction, Inc.,³

Debtor.

Chapter 11

Case No. 24-22548 (CMG)

ORDER FOR ADMISSION *PRO HAC VICE* OF ERIC WINSTON

The relief set forth on the following page is hereby **ORDERED**.

³ The last four digits of CCA's federal tax identification number are 4862. CCA's service address for the purposes of this Chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

This matter having been brought before the Court on the *Application for Admission of Eric Winston Pro Hac Vice*; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed. R. Civ. Proc. 78, D.N.J. L. Civ. R. 101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Eric Winston be permitted to appear *pro hac vice*; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may sign and file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Unless otherwise permitted by the Court, local counsel must attend all hearings and proceedings before the Court, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$250.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further **ORDERED** that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within five (5) days of its date of entry.