

DEBEVOISE & PLIMPTON LLP

M. Natasha Labovitz (admitted *pro hac vice*)
Erica S. Weisgerber (admitted *pro hac vice*)
Elie J. Worenklein
Rory B. Heller (admitted *pro hac vice*)
66 Hudson Boulevard
New York, NY 10001
Telephone: (212) 909-6000
Facsimile: (212) 909-6836
nlabovitz@debevoise.com
eweisgerber@debevoise.com
eworenklein@debevoise.com
rbheller@debevoise.com

Co-Counsel to the Debtor and Debtor in Possession

COLE SCHOTZ P.C.

Michael D. Sirota
Warren A. Usatine
Ryan T. Jareck
Felice R. Yudkin
Court Plaza North, 25 Main Street
Hackensack, NJ 07601
Telephone: (201) 489-3000
Facsimile: (201) 489-1536
msirota@coleschotz.com
wusatine@coleschotz.com
rjareck@coleschotz.com
fyudkin@coleschotz.com

Co-Counsel to the Debtor and Debtor in Possession

**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 M. NATASHA LABOVITZ IN SUPPORT
OF THE DEBTOR'S APPLICATION FOR ENTRY
OF AN ORDER AUTHORIZING THE EMPLOYMENT AND
RETENTION OF DEBEVOISE & PLIMPTON LLP AS BANKRUPTCY
CO-COUNSEL FOR THE DEBTOR EFFECTIVE AS OF THE PETITION DATE**

I, M. Natasha Labovitz, being duly sworn, state the following under penalty of perjury.

1. I am a partner in the law firm of Debevoise & Plimpton LLP ("**Debevoise**"), with an office at 66 Hudson Boulevard, New York, New York 10001. I am a member in good standing of the Bar of the State of New York, and I am admitted to practice before the United States District

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.



Court for the Southern District of New York. In addition, there are no disciplinary proceedings pending against me.

2. I submit this supplemental declaration in compliance with Rule 2014(a) of the Federal Rules of Bankruptcy Procedure to update and supplement the disclosures contained in my previous declaration (the “**Initial Declaration**”)² filed on January 27, 2025, together with, and in support of, the Debtor’s *Application for Entry of an Order Authorizing the Employment and Retention of Debevoise & Plimpton LLP as Bankruptcy Co-Counsel for the Debtor Effective as of the Petition Date* [ECF No. 98]. On February 10, 2025, the Court entered its *Order Authorizing the Employment and Retention of Debevoise & Plimpton LLP as Bankruptcy Co-Counsel for the Debtor Effective as of the Petition Date* [ECF No. 135] (the “**Retention Order**”).

3. Except as otherwise indicated herein, all the facts set forth herein are based upon my personal knowledge of Debevoise’s practices and representation of the Debtor, information learned from my review of relevant documents and/or information supplied to me by other members of and employees of Debevoise. If called upon to testify, I would testify to the facts set forth herein on that basis.

4. The Initial Declaration set forth a list of entities that may be parties in interest with respect to which Debevoise had searched its electronic database for any conflicts or other relationships that might cause it not to be disinterested or to hold or represent an interest adverse to the Debtor. The Initial Declaration noted that the list of potential parties in interest was subject to change during the pendency of this chapter 11 case. Accordingly, Debevoise undertook to update its conflict review and supplement disclosures as necessary and when it became aware of material and relevant information.

² Capitalized terms used herein and not otherwise defined have the respective meanings set forth in the Initial Declaration.

5. Since the entry of the Retention Order, Debevoise received the names of additional entities that may be parties in interest in this chapter 11 case. The updated list of such entities is set forth on **Schedule 1** attached hereto (the “**Updated Conflict Check Parties**”). Based on Debevoise’s conflicts check procedures described in the Initial Declaration, the Updated Conflict Check Parties for whom Debevoise currently acts as counsel or acted as counsel during the last three years or for whose affiliates Debevoise currently acts as counsel or acted as counsel during the last three years that were not previously disclosed in the Initial Declaration are identified on **Schedule 2** hereto. To date, based on that review and except as set forth in the Initial Declaration and Schedule 2 hereto, Debevoise does not have any connection with any of the Updated Conflict Check Parties. Schedule 2 has been compiled with the assistance of my lawyer colleagues at Debevoise who have reviewed conflict records and, to the best of my knowledge, this Schedule is accurate and complete. Debevoise does not, and will not, represent any of the entities set forth on Schedule 2 in matters related to this chapter 11 case or adverse to the Debtor or its estate. To the best of my knowledge and insofar as I have been able to ascertain, all of the work performed for the entities on Schedule 2 is on matters unrelated to the Debtor and the chapter 11 case and none of the entities listed on Schedule 2 together with their respective affiliates accounted for more than 1% of Debevoise’s revenues for the period of September 1, 2024 through September 1, 2025.

6. In addition, certain Debevoise attorneys have professional relationships with Evan Chesler unrelated to the Debtor, and a number of Debevoise attorneys engaged with Mr. Chesler when he served as a mediator in connection with BMLP’s New York State litigation with the Debtor prior to the Petition Date.

7. Based on the conflicts search conducted to date and described herein and in the Initial Declaration, to the best of my knowledge and insofar as I have been able to ascertain, (a)

Debevoise 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 Debtors’ estates, and (b) Debevoise has no connection to the Debtor, its creditors, or other parties in interest, except as may be disclosed herein.

8. Debevoise will periodically review its files during the pendency of the chapter 11 case to use its reasonable efforts to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, Debevoise will use reasonable efforts to identify such further developments and will file a supplemental declaration as soon as practicable.

[Remainder of Page Intentionally Left Blank]

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 belief.

Dated: November 12, 2025
New York, New York

/s/ M. Natasha Labovitz
M. Natasha Labovitz

SCHEDULE 1

Updated Conflict Check Parties

**DEBTOR AND NON-DEBTOR
AFFILIATES**

2 Shore Drive North, LLC
3rd Track Constructors Joint Venture
537 Greenwich JV Mezz LLC
537 Greenwich New JV LLC
537 Greenwich Owner LLC
75 Park Lane, LLC
CCA Bahamas, Ltd.
CCA Canada Holdings, Inc.
CCA China Construction, Inc.
CCA Civil - Halmar International, LLC
CCA Civil Colombia S.A.S.
CCA Civil Panama S.A.
CCA Civil Plaza Construction JV, LLC
CCA Civil, Inc.
CCA Construction, Inc.
CCA Development Panama S.A.
CCA Green B S.A.
CCA Institute, Inc.
CCA International Group, Inc.
CCA Jamaica Development Group Limited
CCA Newport, Inc.
CCA Panama Corp.
CCA Peru Construction S.A.C.
CCA Southeast, Inc.
CCA Unibuy, LLC
CCACP.MCM CONSORCIO
CCASA Civil Mexico S.A.
CCASA DR, S.A.S.
China Construction America of South
Carolina, Inc.
China State Construction Engineering Corp.
Ltd.
China State Construction Engineering
Corporation Panama S.A.
China State Construction Engineering
Corporation Panama S.A. (SEM)
Colonial Hospitality Management Ltd.
CONSORCIO CCA-COCIGE
CSCEC (Bahamas), Ltd.
CSCEC Holding Company, Inc.
Dao Panama Development S.A.
Dynasty Capital Group, LLC
Greenwich Charlton Owner LLC

Hudson North, LLC
Hudson Park Investors, LLC
KM/Plaza
Lakeview Houston, LLC
Morristown Southgate LLC
Newworld One Bay Street Limited
OFICINA T1000-OFICINA 54A, S.A.
Park Lane Development, LLC
Park Shore Investors LLC
Plaza - SEM Corp
Plaza Construction California LLC
Plaza Construction DC LLC
Plaza Construction Holding Company LLC
Plaza Construction LLC
Plaza Contracting Company LLC
Plaza CW LLC
Plaza FL Contracting, LLC
Plaza Group Holdings, LLC
Plaza Schiavone
Plaza/Time Square Joint Venture LLC
POINTE Hospitality Management Ltd.
SC EC-5 Management LLC
Shore Drive North Development, LLC
SRE Development, LLC
Strategic Greenwich Mezz Lender, LLC
Strategic Capital Beijing Consulting Co.
Ltd.
Strategic Capital, LLC
Strategic EB-5 LLC
Strategic Greenwich, LLC
Strategic Hudson North, LLC
Strategic Hudson South, LLC
Strategic Hudson Towers, LLC
Strategic Property Holding Limited
Strategic Real Estate, LLC
Strategic Park Shore, LLC
Yonkers Waterfront Properties, LLC

**CURRENT AND RECENT FORMER
DIRECTORS AND OFFICES**

Jingtao Yang
Jun Li
Lilin Cao
Yan Wei
Elizabeth Abrams

Alrazi Ballal
Chris Greco
Dawei Wang
Emre Ozcan
Jeffrey Clemens
Linsen Zhang
Michael Moore
Ning Yuan
Peter Hulburt
Phillip Amarante
Taizhong Wu
Thomas Crozier
Thomas D'Ercole
Yunfeng Zhang
Zhigang Wu

EXAMINER

McDermott Will & Emery LLP
Todd Harrison

INSURERS

Aetna
AIG
Beazley Insurance Company
Berkley Assurance Company
Chubb
EyeMed
Homesite
Illinois National Insurance Company
Navigators
New Jersey Casualty Insurance Company
ShelterPoint Life Insurance Company
Sompo
Starr Indemnity and Liability Co
Travelers
United Healthcare Oxford

SURETY BOND PROVIDERS

American International Companies
Crum & Forster A Fairfax Company
Euler Hermes North America Insurance Company
Fidelity and Deposit Company of Maryland

Swiss Re Corporate Solutions
United States Fire Insurance Company
Zurich American Insurance Company
Zurich Insurance Group, Ltd.

**COUNTERPARTIES TO CONTRACTS
& LEASES**

Adobe
ADT
AIA Contract Licenses
Benefit Mall
C&M First Services Inc.
Cablevision Lightpath LLC
Corporation Service Company
Exclaimer Ltd
Executive Color systems Inc
Fidelity Investment
First-Citizens Bank & Trust Company
Kelly Mac Interiorscapes Inc.
Korcomptenz Inc
LRN Corporation
Morris Street 2015 Urban Renewal, LLC
Paychex, Inc.
Pitney Bowes Inc.
ReportIt
RS mean
Sage Software Inc.
Stillwell Hansen
StormWind LLC
Thomson Reuters
United Airlines, Inc.

**LANDLORDS, MANAGEMENT
COMPANIES, AND RECENT FORMER
LANDLORDS**

MEPT Newport Tower LLC
Morristown Southgate LLC

LITIGATION PARTIES

Baker Barrios Architects, Inc.
BML Properties, Ltd.
Marina Pointe East Developer, LLC
United States Fire Insurance Company

PROFESSIONALS

Analysis Group, Inc.
Barst Mukamal & Kleiner, LLP
BDO Consulting Group, LLC
Carlton Fields, P.A.
CBIZ Marks Paneth, LLC
Cole Schotz P.C.
Debevoise & Plimpton LLP
FGS Global (US) LLC
FTI Consulting, Inc.
Greenberg Traurig LLP
Kurtzman Carson Consultants, LLC dba
Verita Global
Lilling & Company LLP
Mayer Hoffman McCann CPAs
Pillsbury Winthrop Shaw Pittman LLP
Smith & Downey, P.A.
Socotec Advisory, LLC
Squire Patton Boggs (US) LLP
Withers Bergman LLP
Yutian Phinney

CREDITORS' PROFESSIONALS

B. Riley Securities
Gibbons P.C.
Lowenstein Sandler LLP
Quinn Emanuel Urquhart & Sullivan LLP
Solomon Cramer & Summit LLP
Torre, Lentz, Gamell, Gary & Rittmaster
LLP
Vedder Price P.C.

BANKS

HSBC Bank USA, N.A.

**TAXING AUTHORITIES AND
GOVERNMENTAL AGENCIES**

California Franchise Tax Board
Comptroller of Maryland
Connecticut Department of Revenue
Services

Florida Department of Revenue
IRS
Louisiana Department of Revenue
New Jersey Division of Taxation
New York City Department of Finance
New York State Department of Labor
New York State Department of Taxation and
Finance
Office of Tax and Revenue
Virginia Department of Taxation

VENDORS

4Imprint
AC Daughtry Security Systems
Accordant Company, LLC
Accurate Employment Screening
Adams and Reese LLP
ADP
Alfaro Abogados LLC
Amu Jili
Andy Shihadeh
AP F/B/O Elite Asset Staffing
Aramark
Automation Graphics, Inc.
Bank of Communications
Bing Jia
Blake Cassels & Graydon LLP
Blondie's Treehouse, Inc
Bolati Dawure
Boys & Girls Clubs
Cambridge Floral Designs
CDW Direct
Cettina Infrastructure Advisor
CG Consulting Engineering
Chelsea Piers, L.P.
Chiesa Shahinian & Giantomasi PC
China General Chamber Commerce
ClearCompany LLC
CohnReznick LLP
Counsel Press, Inc.
Computer Design & Integration
Confucius Foundation, Inc
Cosmic Yinyang Inc.
Creative Effects, Inc
Crestmont Country Club

CSC
CT Corporation
CubeSmart, L.P.
Deheng Chen, LLC
Delta General Construction
Ding Ding Multimedia Inc.
DunnCox
Enterprise Tolls
E.S.P. Production, Inc.
EKA Insurance Agency, Inc
Essex Locksmiths LLC
eVerge Group LLC
FASTSIGNS S.I.
FedEx
Fidelity Security Life Insurance
Friedman LLP
Global Leaders In Construction
GM Financial Leasing
Granger Reis Ltd
Graphite Engineering LTD.
Green and Spiegel LLP
Harvard Cleaning Services, Inc.
Harvard Maintenance, Inc.
Helmsman Management Services, LLC
Hercules Fence of Maryland LLC
Hudson River Moving & Storage
International Consulting Group
International Friendship Assoc
Inter-Tour Inc.
ITAV Multimedia Group LLC
Jamal Salter
Jersey Central Power & Light
Jersey City Economic
John Phinney
Kan Vision Inc.
Klasko Immigration Law Partners
Kramer Levin Naftalis & Frankel LLP
Liberty National
Liberty Science Center
Lily Yip Table Tennis Center
LinkedIn Corporation
LYTTC, Inc.
Marcum LLP
Margaret Jackson LLC
Margaritaville Enterprises LLC
Mark L. Vice Jr.

Metlife SBC
National Employee Assistance
NYS Assessment Receivables
NYS Unemployment Insurance
Ohio Bureau of Workers' Compens
Oracle America, Inc
PAS Peru SAC
Pedro Miguel Lorenti
Peerless Consulting Group, LLC
Pellerano & Herrera, Inc.
Perkaroma Coffee Service Inc
Phillip Gesue
Proptex LLC
Proshred Security
Purchase Power
Quench USA, Inc
Quill Corporation
Rosemary T McFadden
R S MEANS COMPANY LLC
SeeFilm LLC
SH Technical Services, Inc.
Six Flags Great Adventure LLC
State of New Jersey
Stericycle, Inc
Strategic Capital (Beijing) Consulting Co.,
Ltd.
Sweet Booths
The Brattle Group, Inc.
The Furniture XChange
The Houston Chapter of China
The Union League Club
Thomas B. Crane
Total Fire Protection
USI Insurance Services
Verizon Wireless
Visory, Inc.
WA Golf Company, LLC
WageWorks
WEX Bank
White & Case LLP
Winston Zhou

**UNITED STATES TRUSTEE AND
BANKRUPTCY JUDGES FOR
DISTRICT OF NEW JERSEY (AND
KEY STAFF MEMBERS)**

Adela Alfaro
Andre M. Espinosa
Andrea D. Bergman
Andrew B. Altenburg, Jr.
Angeliza Ortiz-Ng
Ann Marie Donio
Brian Martinotti
Cathy L. Waldor
Christine M. Gravelle
Christine P. O'Hearn
Claire C. Cecchi
Daniel C. Kropiewnicki
David Gerardi
Edward S. Kiel
Elizabeth A. Pascal
Esther Salas
Evelyn Padin
Fran B. Steele
Francyne D. Arendas
Georgette Castner
J. Brendan Day
Jamel K. Semper
James B. Clark, III
James Stives
Jeanne A. Naughton
Jeffrey Sponder
Jerrold N. Poslusny, Jr.
Jessica S. Allen
John K. Sherwood
Jose R. Almonte
Joseph C. Kern
Joseph H. Rodriguez
Julien X. Neals
Justin T. Quinn
Karen M. Williams
Katharine S. Hayden
Kirsten K. Ardelean
Lauren Bielskie
Leda Dunn Wettre
Madeline Cox Arleo
Mark E. Hall

Martha Hildebrandt
Matthew J. Skahill
Melissa E. Rhoads
Michael B. Kaplan
Michael A. Hammer
Michael A. Shipp
Michael Artis
Michael E. Farbiarz
Peter J. D'Auria
Rachel Wolf
Renee Marie Bumb
Robert J. Schneider, Jr.
Robert Kirsch
Rosemary Gambardella
Rukhsanah L. Singh
Samantha Lieb
Savanna Bierne
Sharon A. King
Stacey D. Adams
Stacey L. Meisel
Stanley R. Chesler
Susan D. Wigenton
Tia Green
Tina L. Oppelt
Tonianne J. Bongiovanni
Vincent F. Papalia
William J. Martini
William J. Ziemer
Zahid N. Quraishi

MEDIATORS

Vincent F. Papalia
Evan Chesler

SCHEDULE 2

Debevoise's Supplemental Connections to Updated Conflict Check Parties

<u>Party in Interest</u>	<u>Relationship to Debtors</u>	<u>Relationship to Debevoise</u>
Illinois National Insurance Company	Insurers	Affiliate of current client
Fidelity and Deposit Company of Maryland	Surety Bond Provider	Affiliate of current client
Jersey Central Power & Light	Vendor	Affiliate of current client
Zurich American Insurance Company	Surety Bond Provider	Current client
Zurich Surety Claims	Surety Bond Provider	Affiliate of current client