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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)

**APPLICATION
FOR ORDER SHORTENING
TIME FOR HEARING ON (I) DEBTOR'S MOTION
FOR ENTRY OF AN ORDER (A) APPROVING A SETTLEMENT
AMONG CCA CONSTRUCTION, INC., CSCEC HOLDING COMPANY,
INC., BML PROPERTIES, LTD., AND CERTAIN RELATED PARTIES AND
(B) GRANTING RELATED RELIEF AND (II) THE RELATED SEALING MOTION**

TO THE HONORABLE CHRISTINE M. GRAVELLE, CHIEF UNITED STATES
BANKRUPTCY JUDGE FOR THE DISTRICT OF NEW JERSEY:

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.



The above-captioned debtor and debtor in possession (“CCA” or the “**Debtor**”) respectfully requests that the time period to notice a hearing on (i) the *Debtor’s Motion for Entry of an Order (A) Approving a Settlement Among CCA Construction, Inc., CSCEC Holding Company, Inc., BML Properties, Ltd., and Certain Related Parties and (B) Granting Related Relief* (the “**Settlement Motion**”) and (ii) the *Debtor’s Motion to File Under Seal Debtor’s Motion for Entry of an Order (A) Approving a Settlement Among CCA Construction, Inc., CSCEC Holding Company, Inc., BML Properties, Ltd., and Certain Related Parties and (B) Granting Related Relief* (the “**Sealing Motion**,” and together with the Settlement Motion, the “**Motions**”)², each filed substantially contemporaneously herewith, as required by Fed. R. Bankr. P. 2002 be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and respectfully submits:

1. **A shortened time hearing is requested because:** As set forth in the Settlement Motion and other papers filed throughout the course of this case, CCA’s chapter 11 case was precipitated by the crippling Baha Mar Judgment entered in connection with the Baha Mar Litigation. Following Court-ordered mediation, the Parties have agreed to the material terms of the Settlement, outlined in the Term Sheet attached as Exhibit B to the Settlement Motion, and as will be set forth in the Settlement Agreement. The terms of the Settlement include a release of claims between the Parties and a resolution of the outstanding disputes related to the Baha Mar Litigation, including CCA’s pending motion for leave to appeal to the New York State Court of Appeals, and the winding-up proceedings for CCAB and CSCECB in The Bahamas initiated by BMLP. The Settlement provides, *inter alia*, that the Parties will withdraw any pending motions in either of these proceedings, including BMLP’s pending motions in this chapter 11 case, upon the Settlement Effective Date. The terms of the Settlement also require CCA to file an application

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

seeking a hearing to consider the relief requested in the Settlement Motion on the shortest notice the Court will permit. Each Party consents to such shortened notice, the related Sealing Motion, and to holding a hearing on the Motions via Zoom or telephone. Expeditious resolution of all pending disputes between the Parties and in connection with the Baha Mar Litigation is essential to the resolution of the Debtor's chapter 11 case. A hearing on the Motions on shortened time will also minimize the possibility that any developments upset the Settlement; enable the prompt resolution of pending actions against CCA and its Non-Debtor Codefendants; and facilitate the expeditious resolution of the remainder of CCA's chapter 11 case.

2. **State the hearing dates requested:** CCA respectfully requests that the Court hold a hearing (including an electronic or telephonic hearing) to consider granting the relief requested in the Motions at the Court's earliest availability, but in no event later than Friday, December 12, 2025. The next omnibus hearing in this case is scheduled for December 2, 2025, at 2:00 p.m. ET. Docket No. 448. In the event the Court desires to hear the Motions at that time, CCA and the other Parties consent to hearing the Motions then.

3. Reduction of the time period for a hearing on the Motions is not prohibited under Fed. R. Bankr. P 9006(c)(1).

WHEREFORE, CCA respectfully requests entry of the proposed order attached hereto as **Exhibit A** shortening time, in substantially the form submitted herewith, granting the relief requested herein and such other relief as is just and proper under the circumstances.

Dated: November 26, 2025

/s/ Michael D. Sirota

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Exhibit A

Proposed Order

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

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

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CCA Construction, Inc.,¹

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Case No. 24-22548 (CMG)

Chapter 11

Judge: Christine M. Gravelle

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(Page | 2)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

Caption of Order: Order Shortening Time Period for Notice

ORDER SHORTENING TIME PERIOD FOR NOTICE

The relief set forth on the following pages, numbered three (3) through four (4), is hereby

ORDERED.

(Page | 3)

Debtor: CCA Construction, Inc.
Case No.: 24-22548 (CMG)
Caption of Order: Order Shortening Time Period for Notice

Upon review of the Debtor's *Application for Order Shortening Time for Hearing on (I) Debtor's Motion for Entry of an Order (A) Approving a Settlement Among CCA Construction, Inc., CSCEC Holding Company, Inc., BML Properties, Ltd., and Certain Related Parties and (B) Granting Related Relief and (II) the Related Sealing Motion* [Docket No. [•]] (the "**Application**")² for entry of an order (this "**Order**") requesting that the time period to notice a hearing on the *Debtor's Motion for Entry of an Order (A) Approving a Settlement Among CCA Construction, Inc., CSCEC Holding Company, Inc., BML Properties, Ltd., and Certain Related Parties and (B) Granting Related Relief* [Docket No. [•]] (the "**Motion**") and the *Debtor's Motion to File Under Seal Debtor's Motion for Entry of an Order (A) Approving a Settlement Among CCA Construction, Inc., CSCEC Holding Company, Inc., BML Properties, Ltd., and Certain Related Parties and (B) Granting Related Relief* [Docket No. [•]] (the "**Sealing Motion**"), be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), IT IS HEREBY ORDERED THAT:

1. A hearing will be conducted on the Motion and the Sealing Motion [via Zoom] on [December [•], 2025] at ____:____ __.m. (E.T.), before the Honorable Christine M. Gravelle.
2. CCA must serve a copy of this Order, and all related documents, to all parties in interest by either regular mail or email, as applicable.
3. Service must be made within ____ days of the date of this Order.
4. Notice by telephone is not required.

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

(Page | 4)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

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5. Any objections to the Motion or Sealing Motion must be filed no later than _____ days before the hearing.
6. Parties must request to appear by Zoom by submitting an email request to Chambers (chambers_of_cmg@njb.uscourts.gov) prior to the return date.