

DEBEVOISE & PLIMPTON LLP

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

COLE SCHOTZ P.C.

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

Co-Counsel to the Debtor and Debtor in Possession

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)

**APPLICATION FOR ORDER SHORTENING
TIME FOR HEARING ON DEBTOR'S MOTION FOR ENTRY OF
AN ORDER (I) APPROVING THE DISCLOSURE STATEMENT ON
AN INTERIM BASIS; (II) SCHEDULING A COMBINED HEARING
ON FINAL APPROVAL OF THE DISCLOSURE STATEMENT AND
PLAN CONFIRMATION AND DEADLINES RELATED THERETO; (III)
APPROVING THE SOLICITATION, NOTICE, AND TABULATION PROCEDURES
AND THE FORMS RELATED THERETO; AND (IV) GRANTING RELATED RELIEF**

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.



24225482512300000000000002

The above-captioned debtor and debtor in possession (“CCA” or the “**Debtor**”) respectfully requests that the time period to notice a hearing on the *Debtor’s Motion for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement and Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice, and Tabulation Procedures and the Forms Related Thereto; and (IV) Granting Related Relief* (the “**Motion**”)², 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:³

1. **A shortened time hearing is requested because:** As the Court is aware, CCA’s chapter 11 case was precipitated by a crippling judgment that has since been settled, following Court-ordered mediation, in accordance with the terms of a global settlement agreement approved by the Court. Following entry of the December 3, 2025 order approving the global settlement, *see* Docket No. 591, in an effort to bring this chapter 11 case to an efficient conclusion, CCA and its professionals have worked, and continue to work, in parallel, to (a) perform under, and implement, the terms of that agreement, including (i) making arrangements for the dismissal of certain pending proceedings upon the settlement effective date as well as (ii) settlement payment mechanics, and (b) advance confirmation-related workstreams, including (i) filing a motion to further extend the Debtor’s exclusivity periods, *see* Docket No. 615, (ii) extending the maturity date of the Debtor’s postpetition financing for an additional six (6) months in accordance with its terms, and (iii) drafting the Debtor’s disclosure statement, plan, and related papers. The Debtor’s

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

³ For the avoidance of doubt, the Debtor seeks shortened notice for the Court’s consideration of the Disclosure Statement and solicitation thereon on an interim basis, which is subject to approval on a final basis at a later hearing.

professionals are advancing the numerous workstreams as quickly as possible under the circumstances and submit that expeditious resolution of the plan process will avoid incurrence of unnecessary costs and facilitate a value-maximizing conclusion to this chapter 11 case for the benefit of all stakeholders.

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 interim relief requested in the Motion at the next omnibus hearing scheduled in this chapter 11 case, which is January 7, 2026, at 2:00 p.m. prevailing Eastern Time, *see* Docket No. 448, or at the Court's earliest availability.

3. Reduction of the time period for a hearing on the Motion 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: December 30, 2025

/s/ Michael D. Sirota

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

fyudkin@coleschotz.com

rjareck@coleschotz.com

-and-

DEBEVOISE & PLIMPTON LLP

M. Natasha Labovitz (admitted *pro hac vice*)

Erica S. Weisgerber (admitted *pro hac vice*)

Elie J. Worenklein

66 Hudson Boulevard

New York, NY 10001

Telephone: (212) 909-6000

Facsimile: (212) 909-6836

nlabovitz@debevoise.com

eweisgerber@debevoise.com

eworenklein@debevoise.com

Co-Counsel to the Debtor and Debtor in Possession

Exhibit A

Proposed Order

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

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

DEBEVOISE & PLIMPTON LLP

M. Natasha Labovitz (admitted *pro hac vice*)

Erica S. Weisgerber (admitted *pro hac vice*)

Elie J. Worenklein

66 Hudson Boulevard

New York, NY 10001

Telephone: (212) 909-6000

Facsimile: (212) 909-6836

nlabovitz@debevoise.com

eweisgerber@debevoise.com

eworenklein@debevoise.com

COLE SCHOTZ P.C.

Michael D. Sirota

Warren A. Usatine

Felice R. Yudkin

Ryan T. Jareck

Court Plaza North, 25 Main Street

Hackensack, NJ 07601

Telephone: (201) 489-3000

Facsimile: (201) 489-1536

msirota@coleschotz.com

wusatine@coleschotz.com

fyudkin@coleschotz.com

rjareck@coleschotz.com

Co-Counsel to the Debtor and Debtor in Possession

In re:

CCA Construction, Inc.,¹

Debtor.

Case No. 24-22548 (CMG)

Chapter 11

Judge: Christine M. Gravelle

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.

(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 Debtor's Motion for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement and Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice, and Tabulation Procedures and the Forms Related Thereto; and (IV) Granting Related Relief* [Docket No. 629] (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 (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement and Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice, and Tabulation Procedures and the Forms Related Thereto; and (IV) Granting Related Relief* [Docket No. 629] (the "**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 [via Zoom] on [January 7, 2026, at 2:00 p.m.] prevailing Eastern Time, 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)

Caption of Order: Order Shortening Time Period for Notice

5. Any objections to the 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.