Docket #0827 Date Filed: 05/20/2026

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1

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-and-

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In re:	Case No.: 25-15343
CBRM REALTY, INC., *et al*.,	Hon. Michael B. Kaplan
Debtors.[1]	Chapter 11

NOTICE OF MOTION FOR ENTRY OF AN ORDER TO COMPEL GODADDY.COM, LLC TO COMPLY WITH RULE 2004 SUBPOENA

PLEASE TAKE NOTICE that on **June 18, 2026 at 10:00 a.m**., or as soon thereafter as counsel may be heard, RLA Consulting, LLC, the creditor recovery trustee (the "**Trustee**") for

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: CBRM Realty Inc. (2420), Crown Capital Holdings LLC (1411), Kelly Hamilton Apts LLC (9071), Kelly Hamilton Apts MM LLC (0765), RH Chenault Creek LLC (8987), RH Copper Creek LLC (0874), RH Lakewind East LLC (6963), RH Windrun LLC (0122), RH New Orleans Holdings LLC (7528), RH New Orleans Holdings MM LLC (1951), and Laguna Reserve Apts Investor LLC (N/A). The location of the Debtors' service address in these chapter 11 cases is: In re CBRM Realty Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.

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the Creditor Recovery Trust for *In Re CBRM Realty Inc.* and *In re Crown Capital Holdings, LLC*, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher United States Courthouse, 402 E. State Street, Trenton, New Jersey, for entry of an order, pursuant to section 105 of the United States Code, 11 U.S.C. §§ 101, *et seq*. (the "**Bankruptcy Code**"), rules 2004 and 9014 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") and local rule 2004-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "**Local Rules**"), compelling GoDaddy.Com, LLC ("**GoDaddy**") to comply with the subpoenas and any other applicable law, and for such other and further relief as is just, proper, and equitable (the "**Motion**").

PLEASE TAKE FURTHER NOTICE that in support of the Trustee's motion, the undersigned shall rely upon the Application in support of the Motion and the proposed form of Order filed herewith. The nature of the relief requested does not require that briefs be submitted as required pursuant to D.N.J. LBR 9013-1.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the "**General Order**") and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the "**Supplemental Commentary**") (the General Order, the Supplemental Commentary, and the User's Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other

parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order, the Supplemental Commentary, and D.N.J. LBR 9013-2, as amended August 1, 2015, so as to be received no later than seven (7) days before the return date of the Motion.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: May 20, 2026

GENOVA BURNS LLC

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