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U.S. Department of Justice

Office of the United States Trustee
District of New Jersey

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May 21, 2026

Via ECF

The Honorable Michael B. Kaplan
United States Bankruptcy Judge
United States Bankruptcy Court for the District of New Jersey
402 East State Street
Trenton, NJ 08608

Re: *In re CBRM Realty Inc.*, Case No. 25-15343 (MBK)

Dear Judge Kaplan:

The United States Trustee (the "U.S. Trustee") submits this letter in response to the Debtors' Notice of Filing Revised Proposed Order Granting the Motion of CBRM Realty Inc., et al. For Final decree Closing Certain of the Chapter 11 Cases (the "Proposed Order"). *See* Dkt. 832. The U.S. Trustee objects to the language added by the Debtors to paragraph 7 of the Proposed Order. The Plans are clear that the Debtors, the Creditor Recovery Trust, the Creditor Recovery Trustee, and the Wind-Down Officer are jointly and severally liable to pay Statutory Quarterly Fees. Instead of converting these cases to chapter 7, Elizabeth A. LaPuma agreed to become the Wind-Down Officer. As such, she steps in the shoes of the Wind-Down Officer and remains liable jointly and severally for all post-effective date statutory fees not just those fees after she was appointed.

It is respectfully requested that Your Honor enter the proposed order filed by the U.S. Trustee yesterday evening at Dkt. 829-1, which does not include the additional language requested by the Debtors in paragraph 7 of the Proposed Order. In addition, as set forth in Dkt. 829, the U.S. Trustee still does not take a position as to whether the language proposed by the Creditor Recovery Trustee and the Creditor Recovery Trust in paragraph 8 of Dkt. 829-1 should be included in the proposed order.

Respectfully submitted,

/s/ Jeffrey M. Sponder
Jeffrey M. Sponder

cc: Gregory F. Pesce
Daniel M. Stolz
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