Docket #0853 Date Filed: 08/24/2026

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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

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In re:	Chapter 11
CBRM REALTY INC., *et al.*,	Case No. 25-15343 (MBK)
Debtors.[1]	(Jointly Administered)

JOINDER OF FAEGRE DRINKER BIDDLE & REATH LLP TO THE OBJECTION OF RLA CONSULTING LLC, IN ITS CAPACITY AS TRUSTEE OF THE CREDITOR RECOVERY TRUST FOR CBRM REALTY INC. AND CROWN CAPITAL HOLDINGS, LLC, TO CBRM REALTY INC.'S MOTION FOR ENTRY OF AN ORDER (A) ENFORCING CONFIRMED CHAPTER 11 PLANS, (B) REQUIRING CREDITOR RECOVERY TRUSTEE TO TRANSFER CASH TO FEE ESCROW ACCOUNT, AND (C) GRANTING RELATED RELIEF

[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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Faegre Drinker Biddle & Reath LLP ("Faegre Drinker") hereby files this joinder (the "Joinder") to the *Objection of RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC* [Docket No. 852] (the "Objection")[2] to *CBRM Realty Inc.'s Motion for Entry of an Order (A) Enforcing Confirmed Chapter 11 Plans, (B) Requiring Creditor Recovery Trustee to Transfer Cash to Fee Escrow Account, and (C) Granting Related Relief* [Docket No. 850] (the "Motion") and respectfully states as follows:

JOINDER

1. In order to avoid burdening the Court with unnecessarily duplicative submissions, and in an effort to minimize the incurrence of legal expenses, Faegre Drinker hereby submits this Joinder.

2. RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC (the "Trustee") argues that the Motion should be denied on grounds including that the Motion requests relief that (a) contradicts the language of the Plans in order to sweep funds to the Debtors' professionals, (b) promotes an interpretation that renders Creditor Recovery Trust operations impossible, and (c) seeks an impermissible post-consummation plan modification in violation of Section 1127(b) of the Bankruptcy Code.

3. To the extent that the Objection seeks the denial of the relief requested in the Motion, Faegre Drinker, which is a holder of a claim for compensation as provided under the last sentence of Article II.A of the Plan, joins in and states support for the Objection. Faegre Drinker

[2] Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection or the Motion.

supports the five arguments made by the Trustee therein, and subject to the reservation of rights herein, Faegre Drinker requests that the Court deny the relief sought in the Motion and grant such other and further relief as may be just and proper.

RESERVATION OF RIGHTS

4. Faegre Drinker hereby reserves all of its rights, claims, defenses, and remedies, including the right to supplement this Joinder, to seek discovery, to raise objections and additional arguments related thereto, and to introduce evidence relating to the Motion and Objection at or prior to any hearing on the Motion and without in any way limiting any other rights of Faegre Drinker to object on any grounds to the Motion, or any other matter in connection therewith, as may be appropriate.

Dated: August 24, 2026

FAEGRE DRINKER BIDDLE & REATH LLP

/s/ Michael P. Pompeo

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Debtors.[1]	(Jointly Administered)

CERTIFICATE OF SERVICE

I, Michael P. Pompeo, hereby certify that a true and correct copy of the foregoing *Joinder of Faegre Drinker Biddle & Reath LLP to the Objection of RLA Consulting LLC, in its Capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC, to CBRM Realty Inc.'s Motion for Entry of an Order (A) Enforcing Confirmed Chapter 11*

[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.

Plans, (B) Requiring Creditor Trustee to Transfer Cash to Fee Escrow Account, and (C) Granting Related Relief (the "Joinder") was filed electronically with the United States Bankruptcy Court for the District of New Jersey (the "Court") on August 24, 2026. The Joinder was sent on August 24, 2026 to all parties via the Court's electronic filing system and served on the parties on the attached Service List in the manner indicated.

Dated: August 24, 2026

FAEGRE DRINKER BIDDLE & REATH LLP

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