Docket #0886 Date Filed: 10/18/2026

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

BODNER LAW PLLC
55 Cherry Lane, Suite 101
Carle Place, New York 11514
(516) 444-3923
Jonathan Bodner, Esq.
jbodner@bodnerlawpllc.com
Local counsel for RLA Consulting LLC, Creditor Recovery Trustee

-and-

The Law Offices of Richard J. Corbi PLLC
104 West 40th St., 4th Floor
New York, NY 10018
(646) 571-2033
Richard J. Corbi (*pro hac vice*)
rcorbi@corbilaw.com
Co-Counsel Counsel for RLA Consulting LLC, Creditor Recovery Trustee

In re: CBRM REALTY, INC., *et al*., Debtors.[1]	Case No.: 25-15343 Hon. Michael B. Kaplan Chapter 11 Hearing Date: on or before October 28, 2026 Objection Date: TBD

APPLICATION FOR ORDER SHORTENING
TIME PERIOD FOR NOTICE UNDER FED. R. BANKR. P. 9006(c)(1)

TO: THE HONORABLE MICHAEL B. KAPLAN,
UNITED STATES BANKRUPTCY JUDGE:

[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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RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC (the "**Trustee**"), by and through its undersigned counsel, requests that the time period to notice a hearing on the Motion of the Creditor Recovery Trustee for Entry of an Order (I) Compelling Hinman, Howard & Kattell, LLP to Produce Its Client and Matter List, (II) Directing the Turnover to the Trustee, as Successor Client, of the Files of Matters in Which a Debtor or a Debtor Subsidiary Was the Client, and (III) Granting Related Relief (the "**Motion**"),[2] filed herewith, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), from the twenty-one (21) days otherwise required by D.N.J. LBR 9013-2(a)(1), and in support states as follows:

1. **A shortened-time hearing is requested because:**

(a) *HH&K has announced that it will file elsewhere on Monday.* By letter dated October 16, 2026, Hinman, Howard & Kattell, LLP ("**HH&K**") stated its intention to move by order to show cause in the United States District Court for the Southern District of New York for an order "providing guidance regarding the waiver of any privilege claims of Moshe Silber and affiliated entities" and conditioning its compliance with the Trustee's Rule 2004 subpoena on the payment of its costs. The same day, HH&K's counsel, Ronald L. Greene, Esq., advised the Trustee's counsel that HH&K intended to file that application early on Monday, October 19, 2026. Corbi Decl. ¶ 10 & Ex. C. An order to show cause in another district may be returnable on a few days' notice. Absent a shortened hearing here, the questions the Motion presents—which entities are Debtors and Debtor subsidiaries, and what rights and privileges passed to the Trustee under the Plans, the Confirmation Orders and the Trust Agreement—may be addressed by another court

[2]Capitalized terms used but not defined herein have the meanings given to them in the Motion. The Motion is supported by the Declaration of Richard J. Corbi, Esq. (the "Corbi Declaration"), filed herewith.

before this Court, which entered those orders and retained jurisdiction over them, has an opportunity to hear them.

(b) *The core relief has been overdue for seven weeks.* The client and matter list sought by the Motion was due on August 28, 2026. HH&K has produced nothing in response to a subpoena served on August 24, 2026, and served no objection within the time provided by Federal Rule 45(d)(2)(B). Corbi Decl. ¶¶ 3–11.

(c) *No party will be prejudiced.* HH&K has had the Subpoena since August 24, 2026, has engaged in correspondence about it for more than five weeks, and by its own account has already identified 1,926 responsive files. The Motion is narrow: it seeks the client and matter list and the files of matters in which a Debtor or a Debtor subsidiary was the client, and it expressly defers the files of all non-Debtor clients to a later written demand. The relief requires no privilege determination as to any non-Debtor. HH&K and all other notice parties will receive the Motion by electronic mail on the day it is filed.

2. **A hearing is requested on or before October 28, 2026**, or on the earliest date thereafter convenient to the Court, with objections to be filed and served by electronic mail no later than two (2) business days before the hearing.

3. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006(c)(2) or the rules listed therein.

4. Contemporaneously with the filing of this Application, the Trustee's counsel is notifying the Chambers of the Honorable Michael B. Kaplan by electronic mail, as required by D.N.J. LBR 9013-2(c).

WHEREFORE, the Trustee requests entry of the proposed Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice submitted herewith.

Dated: October 18, 2026

Respectfully submitted,

BODNER LAW PLLC

By: /s/ Jonathan S. Bodner
Jonathan S. Bodner, Esq.
55 Cherry Lane, Suite 101
Carle Place, New York 11514
(516) 444-3923
jbodner@bodnerlawpllc.com
Local counsel for RLA Consulting LLC, as Trustee of the Creditor Recovery Trust

-and-

THE LAW OFFICES OF RICHARD J. CORBI PLLC

By: /s/ Richard J. Corbi
Richard J. Corbi (*pro hac vice*)
104 West 40th St., 4th Floor
New York, NY 10018
(646) 571-2033
rcorbi@corbilaw.com
Co-counsel for RLA Consulting LLC, as Trustee of the Creditor Recovery Trust

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Richard J. Corbi (*pro hac vice*)
rcorbi@corbilaw.com
Co-Counsel Counsel for RLA Consulting LLC, Creditor Recovery Trustee

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

ORDER SHORTENING TIME PERIOD FOR NOTICE, SETTING HEARING AND LIMITING NOTICE

The relief set forth on the following pages, numbered two (2) and three (3), is hereby **ORDERED**.

[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.

After review of the application of RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC (the "**Trustee**"), for a reduction of time for a hearing on the Motion of the Creditor Recovery Trustee for Entry of an Order (I) Compelling Hinman, Howard & Kattell, LLP to Produce Its Client and Matter List, (II) Directing the Turnover to the Trustee, as Successor Client, of the Files of Matters in Which a Debtor or a Debtor Subsidiary Was the Client, and (III) Granting Related Relief (the "**Motion**"), under Fed. R. Bankr. P. 9006(c)(1), it is

ORDERED as follows:

1. A hearing will be conducted on the matter on _____, 2026 at _____ __.m. in the United States Bankruptcy Court, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, Courtroom No. _____.

2. The Trustee must serve a copy of this Order, and all related documents, on the following parties: Hinman, Howard & Kattell, LLP, to the attention of Ronald L. Greene, Esq. (rgreene@hhk.com) and Daniel H. Roseman, Esq. (droseman@hhk.com); the Office of the United States Trustee; the Chapter 7 Trustee of the estate of Moshe Silber, Case No. 25-21650 (MBK), and her counsel; counsel of record for Moshe Silber in Case No. 25-21650 (MBK); and counsel to the Debtors, by ☐ each, ☒ any of the following methods selected by the Court: ☐ fax, ☒ overnight mail, ☐ regular mail, ☒ email, ☐ hand delivery.

3. The Trustee must also serve a copy of this Order, and all related documents, on the following parties: all parties that have requested notice pursuant to Bankruptcy Rule 2002, by ☐ each, ☒ any of the following methods selected by the Court: ☐ fax, ☐ overnight mail, ☐ regular mail, ☒ email (including through the Court's CM/ECF system), ☐ hand delivery.

4. Service must be made: ☐ on the same day as the date of this Order, or ☒ within one (1) day of the date of this Order.

5. Notice by telephone: ☒ is not required; ☐ must be provided to _____ ☐ on the same day as the date of this Order, or ☐ within _____ day(s) of the date of this Order.

6. A Certification of Service must be filed prior to the hearing date.

7. Any objections to the Motion: ☒ must be filed with the Court and served on all parties in interest by electronic or overnight mail two (2) business days prior to the scheduled hearing; or ☐ may be presented orally at the hearing.

8. Court appearances are required to prosecute the Motion and any objections. Parties may request to appear by phone by contacting Chambers prior to the return date.

9. The hearing will be conducted by Zoom: ☐ using the Judge's standard Zoom link, as listed on the Court's website; or ☐ using the specialized Zoom link or instructions set forth below: _____.