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

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In re:	Case No.: 25-15343 (MBK)
	Chapter: 11
	Judge: Hon. Michael B. Kaplan
CBRM REALTY INC., *et al.*,[1]	**Hearing Date and Time**:
Debtors.	October 29, 2026 at 10:00 a.m. (ET)

MOSHE SILBER'S JOINDER AND RESERVATION OF RIGHTS IN SUPPORT OF KAREN E. BEZNER'S LIMITED OBJECTION TO THE CREDITOR RECOVERY TRUSTEE'S MOTION COMPELLING PRODUCTION AND TURNOVER OF DOCUMENTS AGAINST HINMAN, HOWARD & KATTELL, LLP

Moshe Silber a/k/a Mark Silber ("Mr. Silber"), by and through his undersigned counsel, submits this joinder and reservation of rights (the "Joinder") in support of the *Limited Objection of Karen E. Bezner, Chapter 7 Trustee of the Estate of Moshe Silber, to 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,*

[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 (1115), 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), and RH New Orleans Holdings MM LLC (1951). 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.

of the Files of Matters in which a Debtor or a Debtor Subsidiary was the Client, and (III) Granting Related Relief (the "Limited Objection") [ECF. No. 896]:

JOINDER

1. On October 18, 2026, RLA Consulting LLC, as trustee of the Creditor Recovery Trust (the "CBRM Trustee") filed a motion (the "Motion") asking the Court to compel Hinman, Howard & Kattell, LLP ("HH&K") to produce certain information sought via a Rule 2004 subpoena served upon HH&K on August 24, 2026 (the "Subpoena"), and directing HH&K to turn over said documentation to the CBRM Trustee [ECF. No. 885]. The CBRM Trustee also requested that the Motion be heard on an expedited basis [ECF No. 886].

2. The Court entered an Order on October 19, 2026 (i) setting October 27, 2026 as the objection deadline for the Motion, and (ii) scheduling a hearing to consider this issue for October 29, 2026 [ECF No. 887].

3. Karen E. Bezner, in her capacity as the chapter 7 trustee of the estate of Moshe (a/k/a Mark) Silber (the "Chapter 7 Trustee"), filed the Limited Objection to the Motion (i) challenging the CBRM Trustee's purported claim of "privilege" over certain non-Debtor entities - including Rhodium BA Holdings, LLC n/k/a Vecta Partners LLC ("Vecta"), as well as other entities owned or controlled by Mr. Silber; and (ii) indicating that the Silber Estate possesses competing privilege claims over the documentation whose production is being sought by the CBRM Trustee (and which need to remain protected), among other things. *See* ECF. No. 896.

4. Mr. Silber files this Joinder to express his support to the Limited Objection. In particular, Mr. Silber agrees with the Chapter 7 Trustee's position that (i) the CBRM Trustee bears the burden of proving that it has ownership or control over any non-Debtor entities before attempting to usurp the privileges belonging to them; (ii) Mr. Silber personally holds privilege

interests over certain of the HH&K documentation being sought in the Subpoena which, if produced, would give the CBRM Trustee access to privileged material object of litigation between the parties (such as the Vecta ownership dispute); and (iii) that the Motion is not the appropriate vehicle to decide the Vecta ownership dispute.

RESERVATION OF RIGHTS

5. Notwithstanding this joinder, Mr. Silber expressly reserves all rights and remedies because the attorney-client privilege applicable in this matter belongs to him personally, and not the Silber Estate. *See In re Spitko*, 2007 WL 1720242, at *18–20 (Bankr. E.D. Pa. 2007); *In re Still*, 444 B.R. 520, 522–23 (Bankr. E.D. Pa. 2010). As a result, Mr. Silber's reservation includes, but is not limited to, the right to file additional submissions or pleadings with respect to the Motion and the Limited Objection, the right to be heard at any hearing on the Motion, and the right to object to any written demand the CBRM Trustee may serve on HH&K to non-Debtors entities, among others.

Dated: October 28, 2026

Respectfully submitted,

PORZIO, BROMBERG & NEWMAN, P.C.

By: */s/ Warren J. Martin Jr.*

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