Fill in this information to identify the case:

Debtor RH Copper Creek LLC

United States Bankruptcy Court for the: _____ District of New Jersey (State)

Case number 25-15346

Modified Official Form 410
Proof of Claim

04/25

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) **that you received.**

Part 1: Identify the Claim

1. **Who is the current creditor?**

AFCO Credit Corporation

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. **Has this claim been acquired from someone else?**

☑ No

☐ Yes. From whom? _____

3. **Where should notices and payments to the creditor be sent?**

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?	**Where should payments to the creditor be sent?** (if different)
AFCO Credit Corporation Joel Perrell, Jr., Esq. Womble Bond Dickinson LLP 100 Light Street, 26th Floor Baltimore, MD 21202, USA	
Contact phone 410-545-5854	Contact phone _____
Contact email Joel.Perrell@wbd-us.com	Contact email _____

Uniform claim identifier (if you use one):

_ _

4. **Does this claim amend one already filed?**

☑ No

☐ Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY

5. **Do you know if anyone else has filed a proof of claim for this claim?**

☑ No

☐ Yes. Who made the earlier filing? _____

25153462602090000000000001

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. **Do you have any number you use to identify the debtor?**

☑ No

☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ___ ___ ___ ___

7. **How much is the claim?** $ 107,373.90 . **Does this amount include interest or other charges?**

☐ No

☑ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?**

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.

Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

Limit disclosing information that is entitled to privacy, such as health care information.

General Administrative Claim for money loaned, see addendum

9. **Is all or part of the claim secured?**

☐ No

☑ Yes. The claim is secured by a lien on property.

Nature or property:

☐ Real estate: If the claim is secured by the debtor's principle residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.

☐ Motor vehicle

☑ Other. Describe: Returned unearned premium from business insurance

Basis for perfection: See addendum

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: $ TBD

Amount of the claim that is secured: $ TBD

Amount of the claim that is unsecured: $ TBD (The sum of the secured and unsecured amount should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: $ _____

Annual Interest Rate (when case was filed) _____ %

☐ Fixed

☐ Variable

10. **Is this claim based on a lease?**

☑ No

☐ Yes. **Amount necessary to cure any default as of the date of the petition.** $ _____

11. **Is this claim subject to a right of setoff?**

☑ No

☐ Yes. Identify the property: _____



25153462602090000000000001

12. **Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?**

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

		Amount entitled to priority
☐	No	
☑	Yes. *Check all that apply:*	
☐	Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	$
☐	Up to $3,800* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	$
☐	Wages, salaries, or commissions (up to $17,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	$
☐	Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	$
☐	Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	$
☑	Other. Specify subsection of 11 U.S.C. § 507(a)(2) that applies.	$ 107,373.90

* Amounts are subject to adjustment on 4/01/28 and every 3 years after that for cases begun on or after the date of adjustment.

13. **Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?**

☑ No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

$_____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☑ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 02/09/2026
MM / DD / YYYY

/s/Diana Rieger
Signature

Print the name of the person who is completing and signing this claim:

Name: Diana Rieger
First name Middle name Last name

Title: Senior Vice President, Carrier Returns and Collections Manager

Company: AFCO Credit Corporation
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address: AFCO Credit Corporation, 150 N. Field Drive, Suite 190, Lake Forest, IL, 60045, USA

Contact phone 847-810-8777 Email drieger@afcodirect.com

25153462602090000000000001

Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (866) 523-2941 | International 001-310-823-9000

Debtor:
25-15346 - RH Copper Creek LLC

District:
District of New Jersey, Trenton Division

Creditor:
AFCO Credit Corporation
Joel Perrell, Jr., Esq.
Womble Bond Dickinson LLP
100 Light Street, 26th Floor
Baltimore, MD, 21202
USA
Phone:
410-545-5854
Phone 2:
Fax:
Email:
Joel.Perrell@wbd-us.com

Has Supporting Documentation:
Yes, supporting documentation successfully uploaded
Related Document Statement:

Has Related Claim:
No
Related Claim Filed By:

Filing Party:
Authorized agent

Other Names Used with Debtor:

Amends Claim:
No
Acquired Claim:
No

Basis of Claim:
General Administrative Claim for money loaned, see addendum

Last 4 Digits:
No

Uniform Claim Identifier:

Total Amount of Claim:
107,373.90

Includes Interest or Charges:
Yes

Has Priority Claim:
Yes

Priority Under:
11 U.S.C. §507(a)(2): 107,373.90

Has Secured Claim:
Yes: TBD
Amount of 503(b)(9):
No
Based on Lease:
No
Subject to Right of Setoff:
No

Nature of Secured Amount:
Other
Describe: Returned unearned premium from business insurance
Value of Property:
TBD
Annual Interest Rate:
Arrearage Amount:
Basis for Perfection:
See addendum
Amount Unsecured:
TBD

Submitted By:
Diana Rieger on 09-Feb-2026 8:42:39 a.m. Pacific Time
Title:
Senior Vice President, Carrier Returns and Collections Manager
Company:
AFCO Credit Corporation
Optional Signature Address:
AFCO Credit Corporation
150 N. Field Drive, Suite 190
Lake Forest, IL, 60045
USA
Telephone Number:
847-810-8777
Email:
drieger@afcodirect.com

VN: 9649237DE5991C61A5FD6725ADF053D1

Your claim can be filed electronically on Verita's website at https://www.veritaglobal.net/cbrm

United States Bankruptcy Court for the District of New Jersey

Indicate Debtor against which you assert a claim by checking the appropriate box below. **(Check only one Debtor per claim form.)**

☐ CBRM Realty Inc. (Case No. 25-15343)	☐ RH Chenault Creek LLC (Case No. 25-15349)	☐ RH New Orleans Holdings LLC (Case No. 25-15348)
☐ Crown Capital Holdings LLC (Case No. 25-15351)	☑ RH Copper Creek LLC (Case No. 25-15346)	☐ RH New Orleans Holdings MM LLC (Case No. 25-15347)
☐ Kelly Hamilton Apts LLC (Case No. 25-15352)	☐ RH Lakewind East LLC (Case No. 25-15344)	☐ RH Windrun LLC (Case No. 25-15345)
☐ Kelly Hamilton Apts MM LLC (Case No. 25-15350)		

Modified Official Form 410
Proof of Claim

04/25

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

Part 1: Identify the Claim

1. **Who is the current creditor?**

AFCO Credit Corporation

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. **Has this claim been acquired from someone else?**

☑ No

☐ Yes. From whom? _____

3. **Where should notices and payments to the creditor be sent?**

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?

Joel Perrell, Jr., Esq.
Womble Bond Dickinson (US) LLP
Name

100 Light Street, 26th Floor
Number Street

Baltimore, MD 21202
City State ZIP Code

USA
Country

Contact phone (410) 545-5854

Contact email joel.perrell@wbd-us.com

Where should payments to the creditor be sent? (if different)

Name

Number Street

City State ZIP Code

Country

Contact phone _____

Contact email _____

Uniform claim identifier (if you use one):

_ _

4. **Does this claim amend one already filed?**

☑ No

☐ Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY

5. **Do you know if anyone else has filed a proof of claim for this claim?**

☑ No

☐ Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. **Do you have any number you use to identify the debtor?**

☑ No

☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ___ ___ ___ ___

7. **How much is the claim?**

$ $107,373.90 plus attorneys' fees accrued after Dec. 31, 2025. **Does this amount include interest or other charges?**

☐ No

☑ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?**

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.

Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

Limit disclosing information that is entitled to privacy, such as health care information.

General Administrative Claim for money loaned, see addendum

9. **Is all or part of the claim secured?**

☐ No

☑ Yes. The claim is secured by a lien on property.

Nature of property:

☐ Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.

☐ Motor vehicle

☑ Other. Describe: Returned unearned premium from business insurance policy. See addendum

Basis for perfection: See addendum

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: $ TBD

Amount of the claim that is secured: $ TBD

Amount of the claim that is unsecured: $ TBD (The sum of the secured and unsecured amount should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: $_____

Annual Interest Rate (when case was filed)_____%

☐ Fixed

☐ Variable

10. **Is this claim based on a lease?**

☑ No

☐ Yes. **Amount necessary to cure any default as of the date of the petition.** $_____

11. **Is this claim subject to a right of setoff?**

☑ No

☐ Yes. Identify the property: _____

12. **Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?**

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ No

☑ Yes. *Check all that apply:*

Amount entitled to priority

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). $_____

☐ Up to $3,800* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). $_____

☐ Wages, salaries, or commissions (up to $17,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). $_____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). $_____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). $_____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)(2) that applies. $ $107,373.90

* Amounts are subject to adjustment on 4/01/28 and every 3 years after that for cases begun on or after the date of adjustment.

13. **Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?**

☑ No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

$_____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☑ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 2/6/26
MM / DD / YYYY

Diana Rieger
Signature

Print the name of the person who is completing and signing this claim:

Name: Diana Rieger
First name Middle name Last name

Title: Senior Vice President, Carrier Returns & Collections Manager

Company: AFCO Credit Corporation
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address: 150 N. Field Drive, Suite 190
Number Street

Lake Forest, IL 60045
City State ZIP Code Country

Contact phone (847) 810-8777 Email drieger@afcodirect.com

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY **Caption in Compliance with D.N.J. LBR 9004-1**	
Womble Bond Dickinson (US) LLP Wojciech F. Jung 888 Seventh Avenue, 38th Floor New York, New York 10106 Telephone: (332) 258-8475 E-mail: wojciech.jung@wbd-us.com -and- Joel L. Perrell, Jr., Esq. 100 Light St., 26th Floor Baltimore, Maryland 21202 Telephone: (410) 545-5854 Email: joel.perrell@wbd-us.com *Attorneys for AFCO Credit Corporation*	
In re: CBRM REALTY INC., *et al.*, Debtors.[1]	Chapter 11 Case No. 25-15343 (MBK) (Jointly Administered)

AFCO CREDIT CORPORATION'S MOTION FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE CLAIMS

AFCO Credit Corporation ("AFCO"), by its undersigned attorneys, hereby moves for the entry of an order for allowance and payment of its post-petition administrative expense claims pursuant to 11 U.S.C. §§ 503(b)(1) and 507(a)(2) against Debtors RH Copper Creek LLC (Case No. 25-15343), RH Windrun LLC (Case No. 25-15345), RH Lakewind East LLC (Case No.

[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.

25-15344), Laguna Reserve Apts Investor LLC (Case No. 25-18643), RH New Orleans Holdings LLC (Case No. 25-15348), and RH Chenault Creek LLC (Case No. 25-15349) (collectively, "Select Debtors") and states as follows:

JURISDICTION AND BACKGROUND

1. This court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is appropriate in this court pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. On May 19, 2025 (the "Petition Date"), CBRM Realty Inc. ("CBRM") and its affiliated debtors (collectively, "Debtors") filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code, 11 U.S.C. §§ 101 *et seq*. This case is jointly administered with the Chapter 11 cases for the Debtors, including the Select Debtors.

3. On January 9, 2026, the Court entered the *Notice of Effective Date and Entry of Order Confirming the Revised Modified Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of its Debtor Affiliates* (Doc. 725, the "Bar Date Order"). The Bar Date Order set the deadline for filing General Administrative Claims as February 9, 2026. Doc 725, p. 2.

4. Prior to the Petition Date, Select Debtors entered into that certain Commercial Premium Finance Agreement (the "Agreement") with AFCO, pursuant to which AFCO provided financing to enable Select Debtors to purchase twelve months of commercial insurance coverage for business operations (collectively, the "Insurance Coverage"). Under the terms of the Agreement, Select Debtors promised to repay AFCO in ten (10) monthly installments of $67,198.07.

5. Pursuant to the *Final Order Authorizing the Debtors to Continue Their Prepetition Business Operation, Policies, and Practices and Pay Related Claims in the Ordinary Course of*

Business on a Postpetition Basis (Doc. 226) entered by the Court on June 27, 2025, Debtors obtained approval to honor their ordinary course obligations related to insurance and related insurance premium finance agreements. Doc. 226, ¶¶ 2–3.

6. Subsequently, AFCO and Debtors reached an agreement regarding further payments as embodied in the *Stipulation and Agreed Order Granting AFCO Credit Corporation Adequate Protection, Relief from the Automatic Stay and Related Relief* (Doc. 611, the "Consent Order") entered by the Court on October 14, 2025.

7. Pursuant to the Consent Order, the Insurance Coverage were cancelled. Upon cancellation, AFCO has the right to "obtain all unearned and return premiums payable thereunder, which shall be paid directly to AFCO." Doc. 611, ¶ 2. Out of those funds, AFCO is authorized to apply such amounts against the Select Debtors' outstanding indebtedness due and owing AFCO, including principal, interest, late fees, attorneys' fees, and costs. *Id.*

8. The Consent Order provides that in the event that a deficiency remains after application of all unearned insurance premium proceeds, AFCO is entitled to a Section 503(b)(1) administrative claim "without the need to obtain further relief from the Bankruptcy Court" for any remaining deficiency including principal, interest, attorneys' fees, and costs as allowed by the Agreement and applicable law. *Id.*, ¶ 6.

9. As of February 6, 2026, the Select Debtors' outstanding obligations to AFCO equal no less than $107,373.90 (the "Administrative Claim"), consisting of (i) principal, interest, late fees, and other fees in the amount of $93,480.15, (ii) attorneys' fees and costs through December 31, 2025, in the amount of $13,893.75 as allowed by the Agreement, the Consent Order, and applicable law, and (iii) further attorney's fees accrued after December 31, 2025. *Id*. Attached hereto as **Exhibit A** and incorporated herein by reference is a current Statement of Account

evidencing the above-discussed principal, interest, late fees, and other fees. Additional attorneys' fees and costs have accrued after December 31, 2025, and AFCO reserves all rights to asserts such amounts.[2]

10. AFCO anticipates that there may be further unearned and return premiums that would reduce Select Debtors' outstanding obligations to AFCO.[3] Upon receipt, those amounts will be applied to the obligations owed to AFCO, or, alternatively, returned to the Debtors once AFCO is paid in full.

11. AFCO will provide additional supporting documentation upon reasonable request made to the undersigned.

ARGUMENT

12. Pursuant to section 503(b)(1)(A) of the Bankruptcy Code, "[a]fter notice and a hearing, there shall be allowed administrative expenses . . . including the actual, necessary costs and expenses of preserving the estate . . . ." The Third Circuit has interpreted this Bankruptcy Code provision to require that an administrative expense be "actual" and "necessary", and that the expense yields a benefit to the debtor's estate. *See, e.g. In re Energy Future Holdings Corp.*, 990 F.3d 728, 741 (3d Cir. 2021); *In re Women First Healthcare, Inc.*, 332 B.R. 115, 121 (Bankr. D. Del. 2005).

13. The Administrative Claim qualifies for post-petition administrative expense status. Business insurance was an actual and necessary expense of Debtors' estate and enabled Select Debtors to continue to operate their business.

---

[2] Due to an accounting matter, an invoice for services rendered for the month of January 2026 onward is not available as of the time of this filing.

[3] AFCO reserves the right to amend its Administrative Claim to reflect any unearned premiums collected by AFCO on Select Debtors' outstanding obligations to AFCO and any additional amounts that may become due and owing to AFCO.

14. Because the insurance financed was actual and necessary to assist Select Debtors' business, AFCO has provided a benefit to the estate for which it has not been compensated. AFCO is entitled to an allowed administrative expense claim in the amount of not less than $107,373.90 plus any additional attorneys' fees accrued after December 31, 2025 under Section 503(b)(1) of the Bankruptcy Code.

15. Moreover, AFCO is entitled to an allowed administrative expense claim under Section 503(b)(1) of the Bankruptcy Code pursuant to the Consent Order. Doc. 611, ¶ 6.

16. AFCO reserves the right to assert any and all other claims of whatever kind or nature that it has, or it may have, against the Debtors' estates. The filing of this Motion is not a waiver or release of any claims or rights of AFCO against any other person or entity relating to the services, an election of remedies, or a waiver of any past, present, or future defaults.

WHEREFORE, AFCO respectfully requests that the Court enter an order allowing its Administrative Claim in full, directing full payment to AFCO in accordance with the Bankruptcy Code and the Bar Date Order, and awarding AFCO such other and further relief as the Court deems just and proper.

[Remainder of Page Intentionally Left Blank]

Dated: February 5, 2026

Respectfully submitted,

__/s/ *Wojciech F. Jung*_____
Wojciech F. Jung
WOMBLE BOND DICKINSON (US) LLP
888 Seventh Avenue, 38th Floor
New York, New York 10106
Telephone: (332) 258-8475
E-mail: wojciech.jung@wbd-us.com

-and-

Joel L. Perrell, Jr., Esq.
WOMBLE BOND DICKINSON (US) LLP
100 Light Street, 26th Floor
Baltimore, MD 21202
Telephone: (410) 545-5854
E-mail: joel.perrell@wbd-us.com

Attorneys for AFCO Credit Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of February, 2026, a true and correct copy hereof was filed and served using the Court's CM/ECF system that will provide notice to the parties indicated thereon.

/s/ Wojciech F. Jung
Wojciech F. Jung

EXHIBIT A

Account Transaction History # [redacted] (RH Copper Creek LLC;RH Windrun LLC;RH E Lake LLC;Laguna Reserve Apts LLC;RH New Orleans Holdings LLC;RH Chenault Crk LLC (NDIP))

Click on a payment description for printable receipt

☐ Show Account Notes ☑ Show Account Status ☑ Show Balance After Each Transaction (including fees)

Date	Activity	Transaction Code	Amount	Balance	Description/Note	User	
4/10/2025 9:23:34 AM	Activation			$604,782.63	Account Activated	lisac	
4/10/2025 9:23:34 AM	Status				Current	lisac	
4/10/2025 9:23:34 AM	Installment	RCPT9974087	$67,198.07	$604,782.63	Agent: Statement Payable 1 payment retained.	System	Reve
4/10/2025 11:19:00 AM	Installment	RCPT9974218	$33,344.00	$771,437.63	Insured: Check cc deposit 3/11/2025	rebeccap	
4/10/2025 11:19:01 AM	Installment	RCPT9974219	$49,707.00	$721,730.63	Insured: Check cc dep 3/11/25	rebeccap	
4/10/2025 11:19:01 AM	Installment	RCPT9974220	$50,237.00	$671,493.63	Insured: Check cc dep 3/11/25	rebeccap	
4/10/2025 11:19:01 AM	Installment (short)	RCPT9974221	$66,711.00	$604,782.63	Insured: Check cc dep 3/11/25	rebeccap	
4/16/2025 9:03:05 AM	Installment (short)	RCPT9982675	$24,354.86	$580,427.77	Insured: eCheck	NOLA2025	Reve
4/16/2025 9:05:59 AM	Installment (short)	RCPT9982682	$9,599.72	$570,828.05	Insured: eCheck	NOLA2025	Reve
4/16/2025 9:07:49 AM	Installment (short)	RCPT9982686	$15,466.22	$555,361.83	Insured: eCheck	NOLA2025	Reve
4/16/2025 9:18:56 AM	Installment	RCPT9982691	$17,777.27	$537,584.56	Insured: eCheck	NOLA2025	Reve
5/13/2025 4:00:50 PM	Installment (short)	RCPT10027898	$24,354.86	$513,229.70	Insured: eCheck	NOLA2025	Reve
5/13/2025 4:02:51 PM	Installment (short)	RCPT10027904	$9,599.72	$503,629.98	Insured: eCheck	NOLA2025	Reve
5/13/2025 4:03:52 PM	Installment (short)	RCPT10027905	$15,466.22	$488,163.76	Insured: eCheck	NOLA2025	Reve
5/20/2025 4:31:03 AM	Late Fee	LF28137220	$888.86	$489,052 62		bwatkins	Reve
5/21/2025 5:00:48 AM	Status				Intent To Cancel	System	
6/4/2025 5:00:33 AM	Status				Cancelled	System	
6/4/2025 6:10:41 PM	Installment	RCPT10064069	$17,777.27	$471,275.35	Insured: eCheck	NOLA2025	Reve
6/4/2025 6:10:41 PM	Status				Current	NOLA2025	
6/12/2025 3:12:58 PM	Reversal	RCPT10075912	($33,344.00)	$504,619.35	Insured: Check cc deposit 3/11/2025 3/11 CC dep applied in error. Funds were applied to AIFS acct on 3/18	kathrinap	
6/12/2025 3:13:30 PM	Reversal	RCPT10075913	($49,707.00)	$554,326.35	Insured: Check cc dep 3/11/25 3/11 CC dep applied in error. Funds were applied to AIFS acct on 3/18	kathrinap	
6/12/2025 3:13:52 PM	Reversal	RCPT10075914	($50,237.00)	$604,563.35	Insured: Check cc dep 3/11/25 3/11 CC dep applied in error. Funds were applied to AIFS acct on 3/18	kathrinap	
6/12/2025 3:14:11 PM	Reversal	RCPT10075915	($66,711.00)	$671,274.35	Insured: Check cc dep 3/11/25 3/11 CC dep applied in error. Funds were applied to AIFS acct on 3/18	kathrinap	
6/20/2025 4:30:15 AM	Late Fee	LF28263003	$3,359.90	$674,634.25		bwatkins	Reve
6/23/2025 5:02:09 AM	Status				Intent To Cancel	System	
6/24/2025 4:03:08 PM	Installment (short)	RCPT10093073	$24,354.86	$650,279.39	Insured: eCheck	NOLA2025	Reve
6/24/2025 4:04:34 PM	Installment (short)	RCPT10093075	$17,777.27	$632,502.12	Insured: eCheck	NOLA2025	Reve

Date	Activity	Transaction Code	Amount	Balance	Description/Note	User
6/24/2025 4:05:56 PM	Installment (short)	RCPT10093077	$9,599.72	$622,902.40	Insured: eCheck	NOLA2025 Reve
6/24/2025 4:06:44 PM	Installment (short)	RCPT10093080	$15,466.22	$607,436.18	Insured: eCheck	NOLA2025 Reve
7/20/2025 4:31:05 AM	Late Fee	LF28386180	$3,359.90	$610,796.08		bwatkins Reve
7/29/2025 4:30:06 PM	Installment (short)	RCPT10151600	$17,777.27	$593,018.81	Insured: eCheck	NOLA2025 Reve
7/29/2025 4:31:25 PM	Installment (short)	RCPT10151603	$24,345.86	$568,672.95	Insured: eCheck	NOLA2025 Reve
7/29/2025 4:33:10 PM	Installment (short)	RCPT10151605	$9,599.72	$559,073.23	Insured: eCheck	NOLA2025 Reve
7/29/2025 4:34:09 PM	Installment (short)	RCPT10151606	$15,466.22	$543,607.01	Insured: eCheck	NOLA2025 Reve
8/15/2025 10:45:07 AM	Installment (short)	RCPT10181783	$17,777.27	$525,829.74	Insured: eCheck	NOLA2025 Reve
8/15/2025 10:47:00 AM	Installment (short)	RCPT10181787	$9,599.72	$516,230.02	Insured: eCheck	NOLA2025 Reve
8/15/2025 10:48:18 AM	Installment (short)	RCPT10181790	$15,466.22	$500,763.80	Insured: eCheck	NOLA2025 Reve
8/15/2025 10:53:38 AM	Installment (short)	RCPT10181796	$24,363.86	$476,399.94	Insured: eCheck	NOLA2025 Reve
8/20/2025 4:30:30 AM	Late Fee	LF28515481	$3,359.90	$479,759.84		bwatkins Reve
9/12/2025 12:38:41 PM	Installment (short)	RCPT10227432	$24,354.86	$455,404.98	Insured: eCheck	NOLA2025 Reve
9/12/2025 12:45:10 PM	Installment (short)	RCPT10227442	$9,599.72	$445,805.26	Insured: eCheck	NOLA2025 Reve
9/12/2025 12:46:02 PM	Installment (short)	RCPT10227443	$15,466.22	$430,339.04	Insured: eCheck	NOLA2025 Reve
9/18/2025 11:28:48 AM	Installment	RCPT10236560	$17,777.27	$412,561.77	Insured: eCheck	NOLA2025 Reve
9/20/2025 4:30:53 AM	Late Fee	LF28642906	$3,359.90	$415,921.67		bwatkins Reve
10/15/2025 1:28:22 PM	Installment (short)	RCPT10282615	$24,354.86	$391,566.81	Insured: eCheck	NOLA2025 Reve
10/15/2025 1:29:28 PM	Installment (short)	RCPT10282616	$17,777.27	$373,789.54	Insured: eCheck	NOLA2025 Reve
10/15/2025 1:30:42 PM	Installment (short)	RCPT10282617	$9,599.72	$364,189.82	Insured: eCheck	NOLA2025 Reve
10/15/2025 1:31:50 PM	Installment	RCPT10282620	$15,466.22	$348,723.60	Insured: eCheck	NOLA2025 Reve
10/20/2025 4:31:06 AM	Late Fee	LF28759409	$3,359.90	$352,083.50		bwatkins Reve
11/14/2025 12:40:26 PM	Installment (short)	RCPT10333333	$24,354.86	$327,728.64	Insured: eCheck	NOLA2025 Reve
11/14/2025 12:41:48 PM	Installment (short)	RCPT10333334	$17,777.27	$309,951.37	Insured: eCheck	NOLA2025 Reve
11/14/2025 12:42:46 PM	Installment (short)	RCPT10333336	$9,599.72	$300,351.65	Insured: eCheck	NOLA2025 Reve
11/14/2025 12:43:47 PM	Installment	RCPT10333338	$15,466.22	$284,885.43	Insured: eCheck	NOLA2025 Reve
11/19/2025 3:23:11 PM	Installment	RCPT10340967	$131,097.37	$153,788.06	Insured: eCheck	NOLA2025 Reve
11/19/2025 3:23:11 PM	Status				Current	System
11/20/2025 4:30:43 AM	Late Fee	LF28896479	$3,445.08	$157,233.14		bwatkins Reve
11/21/2025 5:00:47 AM	Status				Intent To Cancel	System
11/26/2025 9:05:34 AM	Status				Cancelled	eryan
12/1/2025 5:02:07 AM	Status				Cancelled. (Follow up notice sent.)	System
12/11/2025 12:56:45 PM	Installment (short)	RCPT10379688	$24,354.86	$132,878.28	Insured: eCheck	NOLA2025 Reve

Date	Activity	Transaction Code	Amount	Balance	Description/Note	User
12/11/2025 12:58:52 PM	Installment (short)	RCPT10379692	$17,777.27	$115,101.01	Insured: eCheck	NOLA2025 Reve
12/11/2025 1:06:00 PM	Installment (short)	RCPT10379700	$9,599.72	$105,501.29	Insured: eCheck	NOLA2025 Reve
12/11/2025 1:07:33 PM	Installment	RCPT10379703	$15,466.22	$90,035.07	Insured: eCheck	NOLA2025 Reve
12/11/2025 1:07:34 PM	Status				Current	NOLA2025
12/20/2025 4:30:55 AM	Late Fee	LF29014694	$3,445.08	$93,480.15		bwatkins Reve
12/22/2025 5:00:06 AM	Status				Intent To Cancel	System
1/6/2026 5:01:02 AM	Status				Cancelled	System