

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

WHITE & CASE LLP

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*Proposed Counsel to Debtors and
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*Proposed Co-Counsel to Debtors and
Debtors-in-Possession*

In re:

CBRM Realty Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 25– 15343 (MBK)

(Joint Administration Requested)

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),



APPLICATION FOR *PRO HAC VICE*
ADMISSION OF LUCAS CURTIS

The undersigned hereby seeks entry of an Order granting the admission *pro hac vice* of Lucas Curtis of the law firm of White & Case LLP, proposed counsel to the debtors and debtors in possession, to practice before this Court in connection with the above-captioned chapter 11 cases.

Pursuant to Rule 2090-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (“L.B.R.”) and Rule 101.1 of the Local Civil Rules for the United States District Court for the District of New Jersey, application is hereby made for an Order for *pro hac vice* admission of Lucas Curtis of the law firm of White & Case LLP.

In support of this Application, the applicant relies upon the attached Certification of Lucas Curtis. Unless requested by other parties, no oral argument is requested. A proposed form of Order is also submitted herewith.

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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: 4499 Pond Hill Road, San Antonio Texas 78231.

Dated: May 22, 2025

Respectfully submitted,

/s/ Andrew Zatz

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ORDER FOR ADMISSION *PRO HAC VICE*

The relief set forth on the following page is **ORDERED**.

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: 4499 Pond Hill Road, San Antonio Texas 78231.

This matter having been brought before the Court on the application for an Order for Admission *Pro Hac Vice*; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Lucas Curtis be permitted to appear *pro hac vice*; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may sign and file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Unless otherwise permitted by the Court, local counsel must attend all hearings and proceedings before the Court, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$250.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building

50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

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**CERTIFICATION OF LUCAS CURTIS IN SUPPORT OF APPLICATION
FOR ADMISSION *PRO HAC VICE***

I, Lucas Curtis, hereby certify pursuant to 28 U.S.C § 1746, as follows:

1. I am an attorney at the law firm of White & Case LLP.
2. I am a member in good standing of the bars of the States of Minnesota and the State of New York, and am duly licensed and admitted to practice in those jurisdictions. I am also a member in good standing of the bars of the United States District Court for the District of Minnesota, the United States District Court for the Southern District of New York, and the United States District Court for the Eastern District of New York.
3. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.
4. I submit this Certification in support of the application to permit me to appear and participate, *pro hac vice*, as proposed counsel to debtors and debtors in possession in this proceeding as I have particularized knowledge of the facts and circumstances relating to this matter.
5. Upon being admitted to appear and participate in this case *pro hac vice*, I shall promptly cause payment to be made to the Clerk of Court in the amount of \$250.00 pursuant to Rule 101.1(c)(3) of the Local Civil Rules for the United States District Court for the District of New Jersey (“D.N.J. L.R.”).
6. I will abide by D.N.J. L.R. 101.1(c).

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7. I understand that, upon admission *pro hac vice*, I am within the disciplinary jurisdiction of this Court and agree to notify the Court immediately of any matter affecting my standing at the bars of any other court.

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

Dated: May 22, 2025

/s/ *Lucas Curtis*
Lucas Curtis