

**COLE SCHOTZ P.C.**

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*Counsel for The Ohio State Life Insurance  
Company and NexBank*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

CBRM Realty Inc., *et al.*,  
  
Debtors.<sup>1</sup>

Chapter 11

Case No. 25-15343 (MBK)

(Joint Administration Pending)

**APPLICATION FOR *PRO HAC VICE* ADMISSION OF CATHERINE CURTIS**

The Ohio State Life Insurance Company (“OSL”) and NexBank (“NexBank”), by and through their counsel, Cole Schotz P.C. respectfully submit this application (the “Application”), for the *pro hac vice* admission of Catherine Curtis, Esq. and represents as follows:

1. On May 19, 2025, the above-captioned debtors and debtors in possession filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, commencing the above captioned chapter 11 cases in the United States Bankruptcy Court for the District of New Jersey (the “Court”).

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<sup>1</sup> 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: 4499 Pond Hill Road, San Antonio Texas 78231.



2. Catherine Curtis is a partner at the firm of Wick Phillips Gould & Martin, LLP. Because of her familiarity with the facts and circumstances relevant to this case, OSL and NexBank request that Ms. Curtis be allowed to appear *pro hac vice* in the within matters.

3. As set forth in the Certification of Ms. Curtis, annexed hereto as **Exhibit A**, Ms. Curtis is a member in good standing of the bar of the State of Texas. Ms. Curtis is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Ms. Curtis has represented that she will adhere to the disciplinary jurisdiction of this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit counsel *pro hac vice* in the above captioned matters.

Respectfully submitted,

**COLE SCHOTZ P.C.**

Counsel for The Ohio State Life Insurance  
Company and NexBank

By: /s/ Jacob Frumkin

Jacob Frumkin

Dated: May 22, 2025

**Exhibit A**

**COLE SCHOTZ P.C.**

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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

CBRM Realty Inc., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-15343 (MBK)

(Joint Administration Pending)

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

CATHERINE CURTIS, of full age, hereby certifies as follows:

1. I am an attorney at law duly admitted to practice before the Courts of the State of Texas, the United States District Courts for the Northern, Eastern, Southern, and Western Districts of Texas, the United States Court of Appeals for the Fifth Circuit, and am a partner at the firm of Wick Phillips Gould & Martin, LLP. I submit this Certification in support of the accompanying Application for my admission *pro hac vice*.

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<sup>1</sup> 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: 4499 Pond Hill Road, San Antonio Texas 78231.

2. I was admitted to practice in the State of Texas in May 2016, the United States District Court for the Northern District of Texas in March 2017, the United States District Court for the Eastern District of Texas in May 2017, the United States District Court for the Southern District of Texas in April 2017, the United States District Court for the Western District of Texas in October 2017, and the United States Court of Appeals for the Fifth Circuit in September 9, 2022.

3. The name and address of the office maintaining the roll of members in good standing for the State of Texas is the State Bar of Texas located at 1414 Colorado Street, Austin, Texas 78701. The name and address of the office maintaining the roll of members in good standing for the United States District Court for the Northern District of Texas is located at 1100 Commerce Street, Dallas Texas 75242. The name and address of the office maintaining the roll of members in good standing for the United States District Court for the Eastern District of Texas is located at 211 West Ferguson Street, Room 106, Tyler, Texas 75702. The name and address of the office maintaining the roll of members in good standing for the United States District Court for the Southern District of Texas is located at 515 Rusk Avenue, Houston, Texas 77002. The name and address of the office maintaining the roll of members in good standing for the United States District Court for the Western District of Texas is located at 501 West Fifth Street, Suite 1100, Austin, Texas 78701. The name and address of the office maintaining the roll of members in good standing for the United States Court of Appeals for the Fifth Circuit is located at 600 S. Maestri Place, Suite 115, New Orleans, Louisiana 70130.

4. If the Application is granted, I agree to abide by this Court's local rules and to submit myself to the disciplinary jurisdiction of this Court.

5. I hereby designate the following member of the bar of this Court with whom the Court and opposing counsel may communicate regarding these cases: Jacob Frumkin, Esq.

6. For the foregoing reasons, I respectfully request the application for *pro hac vice* be granted.

7. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 22, 2025

/s/ Catherine Curtis  
Catherine Curtis

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

In Re:

Case No.: \_\_\_\_\_

Adv. No.: \_\_\_\_\_

Chapter: \_\_\_\_\_

Judge: \_\_\_\_\_

**ORDER FOR ADMISSION PRO HAC VICE**

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

This matter having been brought before the Court on 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 \_\_\_\_\_ 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.

*rev.03/01/2024*