

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

**SILLS CUMMIS & GROSS P.C.**

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-and-

**KRAMER LEVIN NAFTALIS & FRANKEL LLP**

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*Counsel to Spano Investor LLC*

In re:

CBRM Realty Inc., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25–15343 (MBK)

(Joint Administration Requested)

**APPLICATION FOR *PRO HAC VICE* ADMISSION  
OF ADAM C. ROGOFF, ESQ.**

Andrew H. Sherman, Esq. (“Movant”), a member in good standing of the Bar of the State of New Jersey, an attorney admitted to practice before the United States District Court for the District of New Jersey, and a member of the law firm of Silks Cummis & Gross P.C., hereby moves

<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: In re CBRM Realty Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.



for an order permitting Adam C. Rogoff, Esq. to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey to represent Spano Investor LLC pursuant to Local Bankruptcy Rule 9010-1. In support of the relief requested herein, Movant states as follows:

**JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider this application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this application is a core proceeding pursuant to 28 U.S.C. §157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

**RELIEF REQUESTED**

2. By this application, the Movant requests entry of an order admitting Adam C. Rogoff (the “Applicant”) *pro hac vice*. The good standing of the Applicant is set forth in the Applicant’s accompanying certification (the “Certification”).

3. The Applicant is an attorney with Kramer Levin Naftalis & Frankel LLP (“Kramer Levin”) and maintains offices at 1177 Avenue of the Americas, New York, NY 10036. As the Certification demonstrates, Applicant is a member in good standing of the Bar of the highest court in which he is admitted.

4. It is anticipated that Applicant will be active in the representation of Spano Investor LLC in the above-captioned cases. Accordingly, the Movant respectfully requests that the Court grant the *pro hac vice* admission of the Applicant and requests that the Applicant be permitted to appear on behalf of Spano Investor LLC in connection with the above-captioned cases.

5. No previous application for the relief sought herein has been made to this or any other court in connection with these proceedings.

**WAIVER OF MEMORANDUM OF LAW**

6. The Movant respectfully requests that the Court waive the memorandum requirement as set forth in Local Bankruptcy Rule 9013-1. The Movant respectfully submits that no memorandum of law is necessary because no novel issues of law are presented herein.

Dated: May 23, 2025

/s/ Andrew H. Sherman,  
**SILLS CUMMIS & GROSS P.C.**  
Andrew H. Sherman, Esq.  
Boris Mankovetskiy, Esq.  
One Riverfront Plaza  
Newark, New Jersey 07102  
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*Counsel to Spano Investor LLC*

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<b>SILLS CUMMIS &amp; GROSS P.C.</b> Andrew H. Sherman, Esq. Boris Mankovetskiy, Esq. One Riverfront Plaza Newark, New Jersey 07102 Telephone: (973) 643-7000 E-mail: asherman@sillscummis.com bmankovetskiy@sillscummis.com  -and-  <b>KRAMER LEVIN NAFTALIS &amp; FRANKEL LLP</b> Adam C. Rogoff, Esq. ( <i>pro hac vice</i> pending) 1177 Avenue of the Americas New York, NY 10036 Telephone: (212) 715-9285 E-mail: arogoff@kramerlevin.com  <i>Counsel to Spano Investor LLC</i>
In re:  CBRM Realty Inc., <i>et al.</i> ,  Debtors. <sup>1</sup>

Chapter 11

Case No. 25–15343 (MBK)

(Joint Administration Requested)

**CERTIFICATION OF ADAM C. ROGOFF, ESQ.**  
**IN SUPPORT OF *PRO HAC VICE* ADMISSION**

I, Adam C. Rogoff, Esq. hereby state as follows in support of the Application for Admission *Pro Hac Vice*:

1. I am an attorney with the law firm of Kramer Levin Naftalis & Frankel LLP. My

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office is located at 1177 Avenue of the Americas, New York, NY 10036. I submit this Certification in support of the accompanying application for my admission *pro hac vice*.

2. I was admitted to practice in the following state and federal courts in the years set forth below:

<u>Bar</u>	<u>Year of Admission</u>
State of New York	1989
United States Court of Appeals for the Second Circuit	1995
United States District Court for the Southern District of New York	1989
United States District Court for the Eastern District of New York	1989
United States District Court for the Eastern District of Michigan	1999

3. I am a member in good standing of the Bar in every jurisdiction in which I am admitted to practice.

4. I have never been suspended or disbarred from the practice of law. There are no disciplinary proceedings pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.

5. I have familiarized myself with the applicable Rules of Professional Conduct and agree to be bound by these Rules upon my admission.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Date: May 23, 2025

/s/ Adam C. Rogoff  
Adam C. Rogoff, Esq. (*pro hac vice*  
pending)  
1177 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 715-9285  
E-mail: arogoff@kramerlevin.com

<b>UNITED STATES BANKRUPTCY COURT</b> <b>DISTRICT OF NEW JERSEY</b> <b>Caption in Compliance with D.N.J. LBR 9004-1</b>	
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In re:	Chapter 11
CBRM Realty Inc., <i>et al.</i> ,	Case No. 25–15343 (MBK)
Debtors. <sup>1</sup>	(Joint Administration Requested)

**ORDER GRANTING ADMISSION PRO HAC VICE OF ADAM C. ROGOFF, ESQ.**

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

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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 Adam C. Rogoff, Esq. 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 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.