

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

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In re:

CBRM REALTY INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-15343 (MBK)  
(Jointly Administered)

<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 (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.



**SUPPLEMENTAL DECLARATION OF ANDRES A. ESTRADA  
WITH RESPECT TO THE SOLICITATION AND THE TABULATION OF  
VOTES ON THE MODIFIED JOINT CHAPTER 11 PLAN OF  
CROWN CAPITAL HOLDINGS LLC AND CERTAIN OF ITS DEBTOR AFFILIATES**

I, Andres A. Estrada, hereby declare under the penalty of perjury:

1. I am a Managing Director of Corporate Restructuring Services employed by Kurtzman Carson Consultants LLC dba Verita Global (“Verita”), whose main business address is 222 N. Pacific Coast Highway, 3<sup>rd</sup> Floor, El Segundo, California 90245.

2. I submit this supplemental declaration (the “Supplemental Declaration”) with respect to the solicitation of votes and the tabulation of ballots cast on the *Modified Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of Its Debtor Affiliates* [Docket No. 501] (including all exhibits and supplements thereto and as may be modified, amended, or supplemented from time to time, the “Plan”).<sup>2</sup> Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision, and my review of relevant documents. I am authorized to submit this Declaration on behalf of Verita. If I were called to testify, I could and would testify competently as to the facts set forth herein.

3. The Bankruptcy Court authorized Verita’s retention (a) as claims and noticing agent to the Debtors on June 2, 2025 pursuant to the *Order Authorizing the Appointment of Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date* [Docket No. 101], and (b) as administrative advisor to the Debtors on June 18, 2025 pursuant to the *Order Authorizing the Debtors’ Employment and Retention of Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date*

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan, the Disclosure Statement, or the Disclosure Statement Order, as applicable.

[Docket No. 172] (together, the “Retention Orders”). The Retention Orders authorize Verita to assist the Debtors with, among other things, the service of solicitation materials and tabulation of votes cast to accept or reject the Plan. Verita and its employees have considerable experience in soliciting and tabulating votes to accept or reject chapter 11 plans.

4. On October 17, 2025, I submitted the *Declaration of Andres A. Estrada with Respect to the Solicitation and Tabulation of Votes on the Modified Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of Its Debtor Affiliates* [Docket No. 617] (the “Original Declaration”).

5. As noted in the Original Declaration, by agreement between the Debtors and Cleveland International Fund – NRP West Edge, Ltd. (“CIF”), the Voting Deadline for Class 3 – CIF Mortgage Loan Claim was extended to Monday, October 20, 2025, at 4:00 p.m. (prevailing Eastern Time).

6. On October 20, 2025, Verita received a duly executed Ballot from CIF for its Class 3 Claim. Verita reviewed the Ballot in accordance with the procedures approved in the Disclosure Statement Order and determined that it was properly completed, executed, and timely submitted pursuant to the agreed extension.

7. CIF voted to ACCEPT the Plan. The inclusion of CIF’s accepting vote has been incorporated into Verita’s final tabulation. Accordingly, Class 3 – CIF Mortgage Loan Claim voted to accept the Plan.

8. This Supplemental Declaration is submitted to update the record with respect to the additional Ballot received after the filing of the Original Declaration and to reflect the final, complete tabulation of votes received and counted by Verita as of October 20, 2025 (the “Final Tabulation”).

9. Attached hereto is an updated **Exhibit A** of the Final Tabulation of votes cast by timely and properly completed Ballots received by Verita. The detailed Ballot report for Class 3 –

CIF Mortgage Loan Claim is attached hereto as **Exhibit A-1**. Furthermore, attached hereto is **Exhibit B** is an updated report of all Holders of Claims and Interests who opted into the releases, which was filed as Exhibit C to the Original Declaration.

### **CONCLUSION**

To the best of my knowledge, information and belief, the foregoing information concerning the distribution, submission, and tabulation of Ballots in connection with the Plan is true.

Dated: October 21, 2025

/s/ Andres A. Estrada

Andres A. Estrada

Verita

222 N. Pacific Coast Highway, 3rd Floor

El Segundo, CA 90245

Tel 310.823.9000

## **Exhibit A**

## Exhibit A

## Ballot Tabulation Summary

Class Name	Class Description	Not Tabulated	Members Voted	Members Accepted	Members Rejected	% Members Accepted	% Members Rejected	Total \$ Voted	\$ Accepted	\$ Rejected	% \$ Accepted	% \$ Rejected
3	CIF Mortgage Loan Claim	0	1	1	0	100.00	0.00	\$4,832,334.08	\$4,832,334.08	\$0.00	100.00	0.00
4	NOLA Go-Forward Trade Claims	0	5	4	1	80.00	20.00	\$2,039,204.09	\$7,533.78	\$2,031,670.31	0.37	99.63
5	Other NOLA Unsecured Claims	1	27	26	1	96.30	3.70	\$138,927,093.87	\$138,677,093.87	\$250,000.00	99.82	0.18
6	Crown Capital Unsecured Claims	0	26	25	1	96.15	3.85	\$138,922,687.22	\$138,672,687.22	\$250,000.00	99.82	0.18
7	RH New Orleans Unsecured Claims	0	33	32	1	96.97	3.03	\$113,922,687.22	\$113,672,687.22	\$250,000.00	99.78	0.22

**Exhibit A-1**  
**Class 3 Ballot Detail**  
**CIF Mortgage Loan Claim**

Creditor Name	Date Filed	Ballot No.	Voting Amount	Vote	Opt-In to Third-Party Release
Cleveland International Fund - NRP West Edge, Ltd	10/20/2025	145	\$4,832,334.08	Accept	Yes

## **Exhibit B**



**Exhibit B**  
**Opt-In to Third-Party Release**

<b>Creditor Name</b>	<b>Date Filed</b>	<b>Ballot No.</b>	<b>Vote</b>	<b>Opt-In to Third-Party Release</b>
Cleveland International Fund - NRP West Edge, Ltd	10/20/2025	145	Accept	Yes
Complete Apartment Care	09/30/2025	82	Accept	Yes
Evergreen National Indemnity Company	10/01/2025	84 & 85	Accept	Yes
Gramercy Indemnity Company	10/09/2025	118 & 121	Accept	Yes
Gulf Coast Bank and Trust	10/01/2025	83	Accept	Yes
NexBank	10/09/2025	119	Accept	Yes
ROTO ROOTER SERVICES CO	10/08/2025	117	Accept	Yes
Stillwater Insurance Company	10/01/2025	87 & 90	Accept	Yes
Stillwater Property and Casualty Insurance Company	10/01/2025	86 & 91	Accept	Yes