

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.,

Debtor.<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) (collectively, the "**Initial Debtors**"), and Laguna Reserve Apts Investor LLC (N/A) (together with the Initial Debtors, the "**Debtors**"). 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.



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**SUPPLEMENTAL VERIFIED STATEMENT OF KENNETH  
A. ROSEN IN SUPPORT OF APPLICATION BY THE  
DEBTORS TO EMPLOY CHAPTER 11 NEW JERSEY COUNSEL**

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I, Kenneth A. Rosen, declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a shareholder of Ken Rosen Advisors PC (“**KAR**”) and am authorized to practice before the courts of the State of New Jersey, and the federal courts for the State of New Jersey. KAR is co-counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”).

2. I submit this supplemental statement (the “**Supplemental Statement**”) in support of the *Application by the Debtors to Employ Chapter 11 New Jersey Counsel* [Docket No. 174] (the “**Application**”) and to supplement the disclosures set forth in the (a) *Verified Statement of Kenneth A. Rosen in Support of Application by the Debtors to Employ Chapter 11 New Jersey Counsel* [Docket No. 174-1] (the “**First Statement**”), (b) *Supplemental Verified Statement of Kenneth A. Rosen in Support of Application by the Debtors to Employ Chapter 11 New Jersey Counsel* [Docket No. 215, Ex. A] (the “**Second Statement**”), (c) *Verified Statement of Kenneth A. Rosen in Support of Application by the Debtors to Employ Chapter 11 New Jersey Counsel* [Docket No. 223] (the “**Third Statement**”), and (d) the *Supplemental Verified Statement of Kenneth A. Rosen in Support of Application by the Debtors to Employ Chapter 11 New Jersey Counsel* [Docket No. 439] (the “**Fourth Statement**,” and together with the First Statement, Second Statement, and Third Statement, the “**Prior Statements**”).<sup>2</sup> On June 27, 2025, the Court entered the *Order*

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

*Approving the Employment of Chapter 11 New Jersey Counsel* [Docket No. 224] (the “**Retention Order**”).

3. In addition, I submit this Supplemental Statement in support of the *First and Final Fee Application of Ken Rosen Advisors PC* [Docket No. 654] (the “**KAR Fee App**”).

4. Except as otherwise noted herein, I have personal knowledge of the matters set forth herein. To the extent any information disclosed herein requires amendment or modification as additional information becomes available to KAR, I will submit a supplemental statement to this Court reflecting such amended or modified information.

5. As New Jersey counsel and co-counsel, I provided advice regarding compliance with local rules and procedures, ensured that all filings, pleadings, and other documents met the Court’s specific requirements, offered strategic guidance with respect to local nuances that may impact the cases, engaged with Chambers, streamlined administrative processes to ensure that the cases proceeded efficiently, and provided oversight of certain procedural matters.

6. Following informal comments received from the Office of the United States Trustee, I have agreed to reduce the fee request in the KAR Fee App by 5%, i.e., \$2,719.75. That is, the KAR Fee App now requests \$51,675.25 in fees and \$79.25 in expenses. A revised proposed order will be submitted to the Court.

7. Accordingly, based on the information available to me, I believe that (i) KAR is a “disinterested person” within the meaning of section 101(14) of the Bankruptcy Code, as would be required by section 327(a) of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtors’ estates; and (ii) KAR has no connection with any of the Debtors, their affiliates, their creditors, or any other party-in-interest, or their respective attorneys and

accountants, or any persons employed by the U.S. Trustee or the Court, except as may be disclosed in this Supplemental Statement or my Prior Statements.

Dated: November 11, 2025

/s/ *Kenneth A. Rosen*

Kenneth A. Rosen

Ken Rosen Advisors PC