

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

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Jaclynn N. McDonnell, Esq.
dstolz@genovaburns.com
jmcdonnell@genovaburns.com
110 Allen Road, Suite 304
Basking Ridge, NJ 07920
Tel: (973) 533-0777
Fax: (973) 814-4045

*Co-Counsel for RLA Consulting, LLC, Trustee
Of the Creditor Recovery Trust*

In re:

CBRM REALTY, INC.,

Debtors¹.

Chapter 11

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

Honorable Michael B. Kaplan

**APPLICATION FOR AN ORDER FOR ADMISSION
PRO HAC VICE OF RICHARD J. CORBI, ESQ.**

Pursuant to Rule 101.1 of the Local Civil Rules for the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of the United States Bankruptcy Court, District of New Jersey, the undersigned counsel hereby seeks entry of an order granting the admission pro hac vice of Richard J. Corbi, Esq. of the Law Offices of Richard J. Corbi, PLLC, to represent RLA Consulting, LLC, Trustee of the Creditor Recovery Trust in the above-captioned chapter 11 case. In support of this application, counsel submits the attached Certification of Richard J. Corbi, Esq., and requests that the proposed form of order submitted herewith be entered. Counsel certifies that he is admitted, practicing, and a member in good standing with the Bar of the State of New Jersey.

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 (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.



Date: December 8, 2025

/s/ Daniel M. Stolz.

Daniel M. Stolz

GENOVA BURNS LLC

110 Allen Road, Suite 304

Basking Ridge, NJ 07920

Tel: (973) 230-2095

Fax: (973) 814-4045

Email: DStolz@genovaburns.com

*Co-Counsel for RLA Consulting, LLC, Trustee
of the Creditor Recovery Trust*

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GENOVA BURNS LLC Daniel M. Stolz, Esq. Jaclynn N. McDonnell, Esq. dstolz@genovaburns.com jmcdonnell@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 533-0777 Fax: (973) 814-4045 <i>Co-Counsel for RLA Consulting, LLC, Trustee Of the Creditor Recovery Trust</i>	
In re: CBRM REALTY, INC., Debtors ¹ .	Chapter 11 Case No.: 25-15343(MBK) (Jointly Administered) Honorable Michael B. Kaplan

CERTIFICATION OF RICHARD J. CORBI, ESQ.

I, Richard J. Corbi, Esq., hereby certify as follows:

1. I am the owner and founder of the Law Offices of Richard J. Corbi PLLC, co-counsel to RLA Consulting, LLC, Trustee of the Creditor Recovery Trust. My office is located at 104 West 40th Street, 4th Floor, New York, New York 10018. I make this Certification in support of my application to appear in this case *pro hac* vice pursuant to Local Bankruptcy Rule 9010-1.
2. I was admitted to practice law in the State of New York in 2006. I am admitted to Practice before the following courts:

- *United States District Court for the Southern District of New York*

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- *Third Circuit Court of Appeals*
- *Fifth Circuit Court of Appeals*

3. I am a member in good standing of the Bar in each of the jurisdictions in which I am admitted to practice.
4. No disciplinary proceedings are pending against me in any jurisdiction. I have never been suspended or disbarred from the practice of law.
5. I have obtained a copy of the Local Bankruptcy Rules and am generally familiar with such Rules. I will comply with all court and ethical rules governing the practice of law before this Court.
6. I further agree to pay all fees to the Clerk of the United States District Court for the District of New Jersey and the Lawyer's Fund for Client Protection as provided in Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey.

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

Dated: December 8, 2025

/s/ Richard J. Corbi
RICHARD J. CORBI
Law Offices of Richard J. Corbi, PLLC
104 West 40th Street, 4th Floor
New York, New York 10018
Email: RCorbi@corbilaw.com
Co-Counsel for RLA Consulting, LLC,
Trustee of the Creditor Recovery Trust

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In re:

CBRM REALTY, INC.,

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Chapter 11

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

Honorable Michael B. Kaplan

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page 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 RICHARD J. CORBI, 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, 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.