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Co-Counsel to the Debtor and Debtor in Possession

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

In re:

CCA Construction, Inc.,¹

Debtor.

Chapter 11

Case No. 24-22548 (CMG)

**DEBTOR'S WITNESS AND EXHIBIT LIST FOR
HEARING SCHEDULED FOR OCTOBER 9, 2025 AT 11:00 A.M. (ET)**

The above-captioned debtor and debtor in possession (the “**Debtor**”), files this Witness and Exhibit List regarding the hearing scheduled for Thursday, October 9, 2025, at 11:00 a.m. (ET) (the “**Hearing**”).

¹ The last four digits of CCA’s federal tax identification number are 4862. CCA’s service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.



WITNESSES

The Debtor may call the following witnesses (in alphabetical order):

1. **Elizabeth Abrams**, member of the Special Committee of the Board of Directors of the Debtor.
2. Any witness necessary to establish the authenticity or admissibility of documents.
3. Any witness listed by any other party.
4. Rebuttal and impeachment witnesses as necessary.

The Debtor reserves the right to cross examine any witness called by another party. The Debtor reserves the right to supplement or amend this witness list and to identify additional witnesses, including rebuttal and impeachment witnesses, prior to the conclusion of the Hearing.

EXHIBITS

A list of exhibits on which the Debtor may rely at the Hearing is set forth below. The Debtor reserves the right to further supplement or amend this Exhibit List, including to add and/or remove documents prior to the conclusion of the Hearing, including in response to pre-hearing filings, requests for judicial notice, exhibit lists, and/or demonstratives, as well as the evidence and arguments that may be presented by other parties at the Hearing. The Debtor further reserves the right to add documents used for rebuttal. By including a document on this Exhibit List, the Debtor does not thereby agree or admit that a document or category of documents is admissible for any or all purposes. The Debtor reserves the right to object if another party seeks to introduce into evidence exhibits that the Debtor has identified.

Ex. #	Description	Offered	Objection	Disposition	Docket No.
1.	Written Direct Testimony of Elizabeth Abrams in Support of First Day Pleadings and Debtor in Possession Financing and Exhibits Thereto				159
2.	Declaration of Elizabeth Abrams, Director and Sole Member of the Special Committee of the Board of Directors of the Debtor, in Support of the Debtor's Objection to Motion of BML Properties, Ltd. for Entry of an Order (A) Confirming Direct Claims Against CSCEC Holding Company, Inc., (B) Granting Limited Relief from the Automatic Stay to Pursue Post-Judgment Relief in New York State Court or Other Appropriate Forum, (C) Granting Derivative Standing to Pursue Estate Alter Ego Claims Against CSCEC Holding Company, Inc., and (D) Granting Related Relief				507
3.	Email correspondence from in or around August 18, 2025 and prior thereto, among Brett S. Theisen, Esq., Robert K. Malone, Esq., Christopher P. Anton, Esq., and Kyle P. McEvilly, Esq., Gibbons P.C., as counsel to BMLP ² , Michael D. Sirota, Warren A. Usatine, and Felice R. Yudkin, Cole Schotz, P.C., as co-counsel to the Debtor, Morris S. Bauer, Esq., Duane Morris LLP, as counsel to the Special Committee of Independent Directors, and M. Natasha Labovitz, as co-counsel to the Debtor				506

² Capitalized terms not defined herein shall have the meanings ascribed to them in the *Debtor's Objection to Motion of BML Properties, Ltd. for Entry of an Order (A) Confirming Direct Claims Against CSCEC Holding Company, Inc., (B) Granting Limited Relief from the Automatic Stay to Pursue Post-Judgment Relief in New York State Court or Other Appropriate Forum, (C) Granting Derivative Standing to Pursue Estate Alter Ego Claims Against CSCEC Holding Company, Inc., and (D) Granting Related Relief* [Docket No. 475].

Ex. #	Description	Offered	Objection	Disposition	Docket No.
4.	Email correspondence from in or around August 15, 2025 and prior thereto, among Brett S. Theisen, Esq., and Robert K. Malone, Esq., Gibbons P.C., as counsel to BMLP, Michael D. Sirota, Steven L. Klepper, Warren A. Usatine, and Felice R. Yudkin, Cole Schotz, P.C., as co-counsel to the Debtor, Morris S. Bauer, Esq., Duane Morris LLP, as counsel to the Special Committee of Independent Directors, and M. Natasha Labovitz, as co-counsel to the Debtor				506
5.	Report of the Special Committee of Independent Directors of CCA Construction, Inc.				421
6.	Any exhibit necessary to establish the authenticity or admissibility of documents				
7.	Any exhibit listed or introduced by any other party				
8.	Any documents filed in the above-captioned bankruptcy case				
9.	Rebuttal and impeachment exhibits as necessary				

RESERVATION OF RIGHTS

The Debtor reserves the right to call or introduce one or more, or none, of these witnesses or exhibits listed above at the Hearing. The Debtor also reserves the right to supplement, add to, subtract from, or otherwise amend this Witness and Exhibit List at any time prior to the conclusion of the Hearing.

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Dated: October 6, 2025

/s/ Michael D. Sirota

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