Docket #0914 Date Filed: 11/23/2026

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

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-and-

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In re:	Chapter 11
CBRM REALTY INC., et al.,	Case No. 25-15343 (MBK)
Debtors.	(Jointly Administered)
	Hearing Date: TBD
	Objection Date: TBD

APPLICATION FOR ORDER SHORTENING TIME PERIOD FOR NOTICE UNDER FED. R. BANKR. P. 9006(c)(1)

TO: THE HONORABLE MICHAEL B. KAPLAN,
UNITED STATES BANKRUPTCY JUDGE

RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC (the "Trustee"), by and through its undersigned

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counsel, requests that the time period to notice a hearing on the *Motion of the Creditor Recovery Trustee for Entry of an Order (I) Compelling Miriam Mizrachi to Comply with the Order Entered October 21, 2026 [Doc. No. 892], (II) Awarding Fees and Costs Against Ms. Mizrachi and Her Counsel, Okin Hollander LLC, and (III) Granting Related Relief* (the "Motion"),[1] filed herewith, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), from the twenty-one (21) days otherwise required by D.N.J. LBR 9013-2(a)(1), and in support states as follows:

1. A shortened-time hearing is requested because:

(a) *The Court's deadline has already passed.* The Order required Ms. Mizrachi to comply with the Trustee's Rule 2004 subpoena "in all respects" on or before November 20, 2026. Order ¶ 4. On that date she re-delivered the production she made in another proceeding in April 2025 and served objections and responses that defer all further production until an ESI protocol and a Rule 502(d) order are agreed or entered. Corbi Decl. ¶¶ 11–14 & Exs. D, E. A hearing on the regular twenty-one-day schedule would extend, by motion practice, a deadline the Order allowed to be extended only by the Trustee or the Court.

(b) *The Motion should be heard with the discovery the Court has already calendared.* The Court has scheduled a discovery conference for December 7, 2026 at 2:00 p.m. Order ¶ 13; Doc. No. 907 ¶ 3. Ms. Mizrachi's objections and responses tie her further production to matters she expects to be addressed at that conference. Hearing the Motion on or before that date allows the Court to address compliance with the Order at the same time, rather than after it.

[1] Capitalized terms used but not defined herein have the meanings given to them in the Motion. The Motion is supported by the Declaration of Richard J. Corbi, Esq. (the "Corbi Declaration"), filed herewith.

(c) *The investigation is time-sensitive.* The Trustee's investigation of the transfers described in the Trustee's motion to compel [Doc. No. 857] is proceeding against fixed limitations periods, and the documents the Subpoena seeks are documents that only Ms. Mizrachi can produce.

(d) *No party will be prejudiced.* Ms. Mizrachi has had the Subpoena since September 30, 2026 and the Order since October 21, 2026, and has already set out her positions in forty-eight pages of objections and responses. The Motion raises no new issue: it asks the Court to enforce an order it has already entered. Okin Hollander LLC and all other notice parties will receive the Motion by electronic mail on the day it is filed.

2. A hearing is requested on the earliest date thereafter convenient to the Court, with objections to be filed and served by electronic mail no later than two (2) business days before the hearing.

3. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006(c)(2) or the rules listed therein.

4. Contemporaneously with the filing of this Application, the Trustee's counsel is notifying the Chambers of the Honorable Michael B. Kaplan by electronic mail, as required by D.N.J. LBR 9013-2(c).

WHEREFORE, the Trustee requests entry of the proposed Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice submitted herewith.

Dated: November 23, 2026

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In re:

CBRM REALTY INC., et al.,

Debtors.

Chapter 11

Case No. 25-15343 (MBK)

(Jointly Administered)

Re: Doc. Nos. 892, [__]

ORDER SHORTENING TIME PERIOD FOR NOTICE, SETTING HEARING AND LIMITING NOTICE

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

After review of the application of RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC (the "Trustee"), for a reduction of time for a hearing on the *Motion of the Creditor Recovery Trustee for Entry of an Order (I) Compelling Miriam Mizrachi to Comply with the Order Entered October 21, 2026 [Doc. No. 892], (II) Awarding Fees and Costs Against Ms. Mizrachi and Her Counsel, Okin Hollander LLC, and (III) Granting Related Relief* (the "Motion"), under Fed. R. Bankr. P. 9006(c)(1), it is

ORDERED as follows:

1. A hearing will be conducted on the matter on ____, 2026 at ___.m. in the United States Bankruptcy Court, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, Courtroom No. __.

2. The Trustee must serve a copy of this Order, and all related documents, on the following parties: Miriam Mizrachi, through her counsel, Okin Hollander LLC, to the attention of Paul S. Hollander, Esq. (phollander@okinhollander.com) and Rosanne A. Singer, Esq. (rsinger@okinhollander.com), and by overnight delivery to Ms. Mizrachi at the address at which the Rule 2004 subpoena dated August 20, 2026 was delivered; Okin Hollander LLC; the Office of the United States Trustee; the Chapter 7 Trustee of the estate of Moshe Silber, Case No. 25-21650 (MBK), and her counsel; counsel of record for Moshe Silber in Case No. 25-21650 (MBK); and counsel to the Debtors, by ☐ each, ☒ any of the following methods selected by the Court: ☐ fax, ☒ overnight mail, ☐ regular mail, ☒ email, ☐ hand delivery.

3. The Trustee must also serve a copy of this Order, and all related documents, on the following parties: all parties that have requested notice pursuant to Bankruptcy Rule 2002, by ☐

each, ☒ any of the following methods selected by the Court: ☐ fax, ☐ overnight mail, ☐ regular mail, ☒ email (including through the Court's CM/ECF system), ☐ hand delivery.

4. Service must be made: ☐ on the same day as the date of this Order, or ☒ within one (1) day of the date of this Order.

5. Notice by telephone: ☒ is not required; ☐ must be provided to ____ ☐ on the same day as the date of this Order, or ☐ within __ day(s) of the date of this Order.

6. A Certification of Service must be filed prior to the hearing date.

7. Any objections to the Motion: ☒ must be filed with the Court and served on all parties in interest by electronic or overnight mail two (2) business days prior to the scheduled hearing; or ☐ may be presented orally at the hearing.

8. Court appearances are required to prosecute the Motion and any objections. Parties may request to appear by phone by contacting Chambers prior to the return date.

9. The hearing will be conducted by Zoom: ☐ using the Judge's standard Zoom link, as listed on the Court's website; or ☐ using the specialized Zoom link or instructions set forth below: ____.