

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Hudson 1701/1706, LLC, Debtor.	Chapter 11 Case No.: 25-11853 (KBO)
In re: Hudson 1702, LLC, Debtor.	Chapter 11 Case No. 25-11854 (KBO)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the law firm DLA Piper LLP (US) hereby enters its appearance as proposed special counsel to Hudson 1701/1706, LLC and Hudson 1702, LLC (together, the “Debtors”) in the above-captioned bankruptcy cases (the “Bankruptcy Cases”).

PLEASE TAKE FURTHER NOTICE that, Bankruptcy Rules 2002(i), 3017, and 9007, the undersigned requests copies of all notices, pleadings, and all other papers filed or served in the Bankruptcy Cases be given to and served upon the following persons, and that such persons be added to the mailing matrix in the Bankruptcy Cases:

Stuart M. Brown (DE No. 4050)
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- and -

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PLEASE TAKE FURTHER NOTICE that, pursuant to sections 342 and 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Code provisions and Bankruptcy Rules specified above, but also includes, without limitation, any orders and notices of any notice, application, complaint, demand, motion, petition, pleading disclosure statement or plan or reorganization, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, overnight or hand delivery, telephone, or otherwise filed or made with regarding to the Bankruptcy Cases and proceedings therein or which may in any way affect or seek to affect any right or interest of the Debtors.

PLEASE TAKE FURTHER NOTICE that the filing of this Notice of Appearance and Request for Service of Papers (this “Notice”) is intended to constitute only a special appearance to the extent that a general appearance would constitute a waiver of any right. The Debtors do not intend for this Notice, or any subsequent appearance, pleading, proof of claim, or other writing or conduct to constitute a waiver of any: (a) rights to have final orders in any and all non-core matters entered only after *de novo* review by the United States District Court; (b) rights to trial by jury in any proceeding so triable in the Bankruptcy Cases or any case, controversy, or proceeding related to the Bankruptcy Cases; (c) rights to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; (d) any

objection to the jurisdiction of the Bankruptcy Court for any purpose other than with respect of this Notice, or (e) any other rights, claims, defenses, actions, setoffs, recoupments to which the Debtors may be entitled in law or in equity, all of which are hereby expressly reserved. The Debtors' rights are reserved and preserved, without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in the Bankruptcy Cases.

Dated: October 22, 2025
Wilmington, Delaware

DLA PIPER LLP (US)

By: /s/ DRAFT
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Proposed Special Counsel to the Debtors

CERTIFICATE OF SERVICE

I, Stuart M. Brown, hereby certify that on this 22nd day of October, 2025, a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Papers* was served via the Court's CM/ECF system upon the parties registered to receive such notifications in this case.

/s/ Stuart M. Brown
Stuart M. Brown (DE 4050)