

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

In re: Hudson 1701/1706, LLC, Debtor. Employer Identification No.: 88-1290281	Chapter 11 Case No. 25-11853 (KBO)
In re: Hudson 1702, LLC, Debtor. Employer Identification No.: 88-1270190	Chapter 11 Case No. 25-11854 (KBO)

**MOTION OF THE DEBTORS FOR ENTRY OF AN
ORDER (I) GRANTING JOINT ADMINISTRATION OF THEIR
CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

Hudson 1701/1706, LLC and Hudson 1702, LLC (together, the “**Debtors**”), by and through proposed counsel, Chipman Brown Cicero & Cole, LLP, hereby submit this motion (this “**Motion**”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), granting the relief described below. In support of this Motion, the Debtors rely upon the *Declaration of Alan Tantleff in Support of Chapter 11 Petitions, Joint Administration, and Critical Vendors Motion* (the “**First Day Declaration**”),¹ filed contemporaneously herewith. In further support of this Motion, the Debtors respectfully state as follows:

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the First Day Declaration.



RELIEF REQUESTED

1. By this Motion, the Debtors request entry of an Order (i) directing the procedural consolidation and joint administration of these Chapter 11 Cases (*as defined below*) and (ii) granting related relief. In furtherance of such joint administration, the Debtors also request the Court (as defined below) maintain one file and one docket for the jointly administered cases under the case of Hudson 1701/1706, LLC, and that the cases be administered under a consolidated caption.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the District of Delaware (the “**Court**”) has jurisdiction over these Chapter 11 Cases, the Debtors, property of the Debtors’ estates, and this matter under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A).

3. Under rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), the Debtors consent to the entry of a final order by the Court on this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with article III of the United States Constitution.

4. Venue is proper under 28 U.S.C. §§ 1408 and 1409.

5. The statutory bases for the relief requested in this Motion are sections 101(2), 105(a), and 342(c)(1) of 11 U.S.C. § 101 *et seq.* (the “**Bankruptcy Code**”), rules 1005, 1015(b), and 2002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Local Rule 1015-1.

BACKGROUND

6. On October 22, 2025 (the “**Petition Date**”), each of the Debtors commenced a voluntary case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “**Chapter 11 Cases**”). The Debtors are operating their businesses and managing their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code.

7. No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases, and no official committees have been appointed or designated.

8. Additional information regarding the Debtors’ business operations, corporate and capital structures, and restructuring efforts are described in greater detail in the First Day Declaration, which is incorporated in this Motion by reference.

BASIS FOR RELIEF

I. Joint Administration of These Chapter 11 Cases is Warranted.

9. Bankruptcy Rule 1015(b) provides that “if . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order joint administration of the estates.” Similarly, Local Rule 1015-1 provides that an order of joint administration may be entered, upon the filing of a motion for joint administration under Bankruptcy Rule 1015(b).

10. Section 101(2) of the Bankruptcy Code defines the term “affiliate” broadly, in pertinent parts, as an:

(A) entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor [or a]

(B) corporation 20 percent or more of whose outstanding voting securities are directly or indirectly owned, controlled, or held with power to vote, by the debtor, or by an entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor

11. Each Debtor in these Chapter 11 Cases is an affiliated entity. Each of Debtor Hudson 1701/1706, LLC and Debtor Hudson 1702, LLC are wholly owned, direct subsidiaries of non-debtor PV Hudson LLC. Therefore, the Debtors are “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code and the Court is authorized to jointly administer these Chapter 11 Cases for procedural purposes under Bankruptcy Rule 1015(b) and Local Rule 1015-1.

12. The Debtors share common ownership and control, and relate to the same project. As a result, many, if not all, of the motions, hearings, and orders that will arise in these cases will affect both Debtors. Joint administration of these Chapter 11 Cases, therefore, will reduce fees and administrative burdens by avoiding duplicative filings, objections, notices and hearings.

13. Joint administration of these Chapter 11 Cases avoids two separate dockets with numerous duplicative filings for each issue. Further, joint administration will relieve the Court of entering duplicative orders and maintaining duplicative files and dockets. Joint administration will save time and money and avoid such duplicative and potentially confusing filings by permitting counsel for all parties in interest to: (a) use a single caption on the numerous documents that will be served and filed in these Chapter 11 Cases; (b) file the pleadings in one case rather than in multiple cases; and (c) refer to one case docket in order to review all pleadings filed in these Chapter 11 Cases.

14. Importantly, the rights of the Debtors’ creditors will not be adversely affected by joint administration of these Chapter 11 Cases because this Motion requests only the administrative consolidation of the estates for procedural purposes and does not seek substantive consolidation. Creditors and other parties in interest will maintain their rights against each of the respective estates, as applicable. Further, because these Chapter 11 Cases involve many similar parties in

interest, entry of the Proposed Order will: (a) reduce the volume of pleadings that otherwise would be filed with the Clerk of the Court; (b) reduce the cost of various administrative tasks; and (c) minimize unnecessary delays associated with the administration of multiple separate chapter 11 cases.

15. An order of joint administration relates to the routine, uncontroversial administration of a case and may be entered by the Court in its sole discretion on an *ex parte* basis. See Local Rule 1015-1. No party will be prejudiced by the relief requested in this Motion, as it is solely procedural and is not intended to affect substantive rights.

II. The Proposed Consolidated Caption Satisfies the Relevant Requirements.

16. Bankruptcy Rule 1005 contains specific requirements relating to the contents of the caption.² A proposed consolidated caption for all notices, applications, motions and other pleadings is attached as Exhibit 1 to the Proposed Order (the “**Proposed Caption**”). Under section 342(c)(1) of the Bankruptcy Code, “[i]f notice is required to be given by the debtor to a creditor . . . such notice shall contain the name, address, and last four digits of the taxpayer identification number of the debtor.” The Proposed Caption contains all of the required information to satisfy Bankruptcy Rule 1005 and section 342(c)(1) of the Bankruptcy Code.

17. Further, use of the Proposed Caption will ensure a uniformity of pleading identification. Additionally, case-specific information will be listed in the petitions for each Debtor, which are publicly available to parties in interest, and this information will be included in

² Bankruptcy Rule 1005 specifies that:

[t]he caption of a petition commencing a case under the Code shall contain the name of the court, the title of the case, and the docket number. The title of the case shall include the following information about the debtor: name, employer identification number, last four digits of the social-security number or individual debtor’s taxpayer-identification number, any other federal taxpayer-identification number, and all other names used within eight years before filing the petition. If the petition is not filed by the debtor, it shall include all names used by the debtor which are known to the petitioners.

key notices to parties in interest, such as the notices required under Bankruptcy Rules 2002(a)(1), 2002(a)(7), and 2002(b), as applicable to these Chapter 11 Cases. Therefore, the policies behind the requirements of section 342(c) of the Bankruptcy Code and Bankruptcy Rule 2002(n) have been satisfied.

18. The Debtors further request that an entry be made on the docket in the chapter 11 case of Debtor Hudson 1702, LLC, substantially as follows:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing joint administration for procedural purposes only of the chapter 11 cases of: Hudson 1701/1706, LLC; and Hudson 1702, LLC. The docket for Hudson 1701/1706, LLC, Case. No. 25-11853 (KBO), should be consulted for all matters affecting these cases.

NOTICE

19. Notice of this Motion will be provided to: (a) the Office of the United States Trustee for Region 3; (b) the Office of the United States Attorney for the District of Delaware; (c) the holders of the 20 largest unsecured claims against the Debtors (on a consolidated basis); (d) the Internal Revenue Service; (e) counsel to Parkview Financial REIT, LP; (f) the attorney general for each state in which the Debtors operate; (g) the Debtors' Landlord, MSP Capital Investments, L.L.C. (Attn: Danielle Ash [dash@adstach.com] and Morgan Stevens [mstevens@adstach.com]); (h) any party that has requested notice pursuant to Bankruptcy Rule 2002; and (i) any other party entitled to notice under Local Rule 9013-1. As this Motion is seeking "first day" relief, notice of this Motion and any order entered in connection herewith will be served on all parties required by Local Rule 9013-1(m). The Debtors respectfully submit that such notice is sufficient, and no other further notice of this Motion is required.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached to this Motion as **Exhibit A**, granting the relief requested in this Motion and such other and further relief as the Court may deem just and proper.

Dated: October 30, 2025
Wilmington, Delaware

Respectfully submitted,

CHIPMAN BROWN CICERO & COLE, LLP

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Proposed Counsel to the Debtors

Exhibit A

Proposed Order

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

In re:	Chapter 11
Hudson 1701/1706, LLC,	Case No. 25-11853 (KBO)
Debtor.	Related to Docket No. ____
Employer Identification No.: 88-1290281	
In re:	Chapter 11
Hudson 1702, LLC,	Case No. 25-11854 (KBO)
Debtor.	Related to Docket No. ____
Employer Identification No.: 88-1270190	

**ORDER (I) GRANTING JOINT ADMINISTRATION OF THE
DEBTORS CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “**Motion**”)¹ filed by the above-captioned debtors (collectively, the “**Debtors**”) for entry of an order (this “**Order**”), (i) directing the procedural consolidation and joint administration of these Chapter 11 Cases, and (ii) granting related relief, all as further described in the Motion; and upon consideration of the First Day Declaration; and this Court having jurisdiction over the Debtors and their estates pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding under 28 U.S.C. § 157(b)(2)(A); and this Court having found that this Court may enter an order consistent with article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409; and this Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors’ estates, their creditors and other parties in interest; and this Court having found

¹ Capitalized terms used but not otherwise defined in this Order have the meaning given to them in the Motion.

that the Debtors' notice of the Motion and opportunity for a hearing were adequate and appropriate under the circumstances and no other or further notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested in the Motion at a hearing before this Court (the "**Hearing**"); and having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted in this Order; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth in this Order.
2. The above-captioned Chapter 11 Cases are consolidated for procedural purposes only and shall be jointly administered under Case No. 25-11853 (KBO) in accordance with the provisions of Bankruptcy Rule 1015(b) and Local Rule 1015-1.
3. Parties in interest are authorized to use the Proposed Caption, attached hereto as **Exhibit 1**, which satisfies the requirements of section 342(c) of the Bankruptcy Code, when filing a pleading with the Court in the Chapter 11 Cases, indicating that the pleading relates to the jointly administered Chapter 11 Cases of "Hudson 1701/1706, LLC, *et al.*"
4. An entry substantially similar to the following shall be entered on the docket of Debtor Hudson 1702, LLC to reflect the joint administration in the chapter 11 case:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing joint administration for procedural purposes only of the chapter 11 cases of: Hudson 1701/1706, LLC; and Hudson 1702, LLC. The docket for Hudson 1701/1706, LLC, Case. No. 25-11853 (KBO), should be consulted for all matters affecting these cases.

5. The Debtors shall maintain, and the Clerk of the United States Bankruptcy Court for the District of Delaware shall keep, one consolidated docket, one file, and one consolidated service list for these Chapter 11 Cases.

6. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effectuating a substantive consolidation of the Debtors or their estates and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases and likewise without prejudice to the rights of a party in interest to oppose entry of such order.

7. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a), if applicable, and the Local Rules are satisfied by such notice.

8. The Debtors are hereby authorized to take all actions they deem necessary to effectuate the relief granted in this Order.

9. Notwithstanding any Bankruptcy Rule or Local Rule to the contrary, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

10. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Exhibit 1

Proposed Caption

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

In re:

Hudson 1701/1706, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11583 (KBO)

(Jointly Administered)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Hudson 1701/1706, LLC (0281) and Hudson 1702, LLC (0190). The Debtors' headquarters and the mailing address for the Debtors is 11440 San Vicente Boulevard, 2nd Floor, Los Angeles, CA 90045.