

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Hudson 1701/1706, LLC, <i>et al.</i> , ¹	Case No. 25-11853 (KBO)
Debtors.	(<i>Joint Administration Requested</i>)
	Related to Docket No. 13

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

The undersigned proposed counsel for the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certifies as follows:

1. On October 30, 2025, the Debtors filed the *Motion of the Debtors for Entry of an Order (I) Granting Joint Administration of Their Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 13] (the “**Motion**”). Attached to the Motion as Exhibit A was a proposed order (the “**Proposed Order**”).

2. The Debtors received informal comments from the Office of the United States Trustee (the “**U.S. Trustee**”). No other responses to the Motion were received.

3. The Debtors hereby submit a revised form of order (the “**Revised Order**”), attached hereto as Exhibit A, which reflects changes to the Proposed Order attached to the Motion and incorporates comments from the U.S. Trustee. The Revised Order has been reviewed and approved by the U.S. Trustee. Attached as Exhibit B is a blackline of the Revised Order against the Proposed Order.

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.



WHEREFORE, the Debtors respectfully request that the Court enter the Revised Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: October 31, 2025
Wilmington, Delaware

Respectfully submitted,

CHIPMAN BROWN CICERO & COLE, LLP

/s/ William E. Chipman, Jr.

William E. Chipman, Jr. (No. 3818)

Mark D. Olivere (No. 4291)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801

Telephone: (302) 295-0191

Email: chipman@chipmanbrown.com

olivere@chipmanbrown.com

Proposed Counsel to the Debtors

EXHIBIT A

Revised 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. 13
Employer Identification No.: 88-1290281	
In re:	Chapter 11
Hudson 1702, LLC,	Case No. 25-11854 (KBO)
Debtor.	Related to Docket No. 13
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 the first sentence of section 342(c)(1) 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.

EXHIBIT B

Redline Order

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

<div>In re:</div> <div>Hudson 1701/1706, LLC,</div> <div style="text-align: right;">Debtor.</div> <div>Employer Identification No.: 88-1290281</div>	<div>Chapter 11</div> <div>Case No. 25-11853 (KBO)</div> <div>Related to Docket No. <u> 13 </u></div>
<div>In re:</div> <div>Hudson 1702, LLC,</div> <div style="text-align: right;">Debtor.</div> <div>Employer Identification No.: 88-1270190</div>	<div>Chapter 11</div> <div>Case No. 25-11854 (KBO)</div> <div>Related to Docket No. <u> 13 </u></div>

**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 the first sentence of section 342(c)(1) 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.