

**I 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. 25-11853 (KBO)

(Jointly Administered)

MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) AUTHORIZING DEBTORS TO (A) FILE A CONSOLIDATED LIST OF CREDITORS IN LIEU OF SUBMITTING A SEPARATE MAILING MATRIX FOR EACH DEBTOR; (B) FILE A CONSOLIDATED LIST OF TOP TWENTY (20) LARGEST UNSECURED CREDITORS; AND (C) REDACT CERTAIN PERSONALLY IDENTIFIABLE INFORMATION OF NATURAL PERSONS; AND (II) GRANTING RELATED RELIEF

Hudson 1701/1706, LLC and its affiliate, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**,” or the “**Company**”), hereby move (this “**Motion**”) this Court for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), granting the relief described below. In support thereof, the Debtors rely on the *Amended and Restated Declaration of Alan Tantleff in Support of Debtors’ Chapter 11 Petitions and First Day Motions* (the “**First Day Declaration**”),² and respectfully represent as follows:

RELIEF REQUESTED

1. By this Motion, the Debtors respectfully request entry of an Order: (i) authorizing the Debtors to (a) file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each Debtor, (b) file a consolidated list of the Debtors’ twenty (20) largest general unsecured

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.

2 Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the First Day Declaration.



creditors, and (c) redact certain personally identifiable information of natural persons; and (ii) granting related relief.

JURISDICTION AND VENUE

2. This Court has jurisdiction to consider the Motion 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. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

3. The legal predicates for the relief requested herein are sections 105(a), 107(c), 342(a), and 521 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rules 1007 and 2002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rules 1001-1(c), 1007-2, 2002-1, 9013-1(m) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”).

4. Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final judgment or order with respect to this Motion if it is determined that this Court would lack Article III jurisdiction to enter such final order or judgment absent the consent of the parties.

BACKGROUND

I. THE CHAPTER 11 CASES.

5. On October 22, 2025 (the “**Petition Date**”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “**Court**”), thereby commencing these cases (the “**Chapter 11 Cases**”). The Chapter 11 Cases are jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

6. The Debtors continue to be in possession of their properties, to operate their business, and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

7. To date, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) has not appointed a creditors’ committee in the Chapter 11 Cases, not has any trustee or examiner been appointed therein.

8. Additional factual background regarding the Debtors, including their business operations, their capital and debt structures and the events leading to the filing of these Chapter 11 Cases, is set forth in the First Day Declaration, which is fully incorporated herein by reference.

BASIS FOR RELIEF REQUESTED AND APPLICABLE AUTHORITY

I. THE DEBTORS SHOULD BE AUTHORIZED TO FILE A CONSOLIDATED CREDITOR MATRIX.

9. Local Rule 2002-1(f)(v) requires each debtor, or its duly retained agent, in jointly administered cases to maintain a separate creditor mailing matrix. Del. Bankr. L.R. 2002-1(f)(v). Local Rule 1001-1(c) permits the Court to modify the Local Rules “in the interest of justice” and Local Rule 1007-2(a) allows multiple debtors in a case where a claims and noticing agent is required, to file a consolidated list of creditors. Del. Bankr. L.R. 1001-1(c) and 1007-2(a). The Debtors submit that permitting them to maintain a single consolidated list of creditors (the “**Creditor Matrix**”), in lieu of filing a separate creditor matrix for each Debtor, is warranted. Requiring the Debtors to segregate and convert their computerized records to a Debtor-specific creditor matrix format would be unnecessarily burdensome and would result in confusing and duplicative notices.³

³ If any of the Debtors’ Chapter 11 Cases converts to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor will maintain its own creditor mailing matrix.

10. Courts in this district have routinely granted the same or similar relief to chapter 11 debtors. *See, e.g., In re American Tire Distributors, Inc., et al.*, Case No. 24-12391 (CTG) [Docket No. 78] (Bankr. D. Del. Oct. 25, 2024) (authorizing the debtors to, among other things, file a consolidated creditor matrix, file a consolidated top 30 list of unsecured creditors, and redact certain confidential or personally identifiable information); *In re True Value Co., L.L.C., et al.*, 24-12337 (KBO) [Docket No. 92] (Bankr. D. Del. Oct. 17, 2024) (same); *In re Tupperware Brands Corp., et al.*, Case No. 24-12156 (BLS) [Docket No. 72] (Bankr. D. Del. Sept. 20, 2024) (same); *In re Hardinge Inc., et al.*, Case No. 24-11605 (JKS) [Docket No. 64] (Bankr. D. Del. July 30, 2024) (same); *Optio Rx, LLC, et al.*, Case No. 24-11188 (TMH) [Docket No. 28] (Bankr. D. Del. June 11, 2024) (same); *In re Armstrong Flooring, Inc., et al.* Case No. 22-10426 (MFW) [Docket No. 100] (Bankr. D. Del. May 12, 2022) (same).⁴

II. THE DEBTORS SHOULD BE AUTHORIZED TO FILE A SINGLE CONSOLIDATED LIST OF THE DEBTORS' TWENTY (20) LARGEST UNSECURED CREDITORS.

11. Additionally, Bankruptcy Rule 1007(d) requires the Debtors to file “a list containing the names, addresses and claims of the creditors that hold the 20 largest unsecured claims.” Fed. R. Bankr. P. 1007(d). This “Top 20” List is used to facilitate the appointment of a creditors’ committee by the U.S. Trustee. *See In re Dandy Doughboy Donuts, Inc.*, 66 B.R. 457, 458 (Bankr. S.D. Fla. 1986) (“The purpose of the separate list of 20 largest creditors required by [Bankruptcy Rule 1007(d)] is to enable the clerk to identify members and the court to appoint immediately an unsecured creditors’ committee in compliance with 11 U.S.C. 1102(a)(1).”).

12. The Debtors request authority to file a single list of their twenty (20) largest general unsecured, non-insider creditors on a consolidated basis (the “**Top 20 List**”). The Debtors share

⁴ Because of the voluminous nature of the orders cited herein, they are not attached to this Motion. Copies of these orders, however, are available on request.

a common nucleus of large creditors. Because the top creditors of the Debtors could overlap, and certain Debtors may have fewer than twenty significant unsecured creditors, filing separate Top 20 Lists for each Debtor would be of limited utility. A consolidated Top 20 List will sufficiently aid the U.S. Trustee in communicating with these creditors. In light of the foregoing, compiling separate creditor lists for each Debtor would consume a substantial amount of the Debtors' limited time and resources, with little, if any, attendant value to the Debtors' estates or the U.S. Trustee. Accordingly, the Debtors submit that a consolidated list of the Debtors' twenty (20) largest unsecured creditors is reasonable under the circumstances.⁵

13. Courts in this district have routinely granted the same or similar relief to chapter 11 debtors. *See supra* ¶ 10.

III. THE DEBTORS SHOULD BE AUTHORIZED TO REDACT CERTAIN PERSONALLY IDENTIFIABLE INFORMATION FOR NATURAL PERSONS.

14. Although the public has a common law “[r]ight of access to judicial proceedings and records[.]” *Goldstein v. Forbes (In re Cendant Corp.)*, 260 F.3d 183, 192 (3d Cir. 2001), the Bankruptcy Code permits courts, in appropriate circumstances, to protect individuals from an undue risk of identity theft or other unlawful injury by limiting the public’s access, placing papers under seal, or otherwise entering orders to prohibit the dissemination of sensitive information. 11 U.S.C. § 107(c); *see In re Cendant Corp.*, 260 F.3d at 194 (noting the public’s right of access “is not absolute”) (citation and internal quotation marks omitted); *see also Leucadia, Inc. v. Applied Extrusion Tech., Inc.*, 998 F.2d 157, 165 (3d Cir. 1993) (“Although the right of access is firmly entrenched, so also is the correlative principle that the right . . . is not absolute.”) (internal citations omitted).

⁵ If any of the Debtors’ Chapter 11 Cases converts to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor will file an unconsolidated “Top 20” list within fourteen (14) days of any such conversion.

15. Specifically, section 107 of the Bankruptcy Code enables a court to issue orders that protect parties from the potential harm that could result from disclosing confidential information. Section 107(b) of the Bankruptcy Code provides, in pertinent part, as follows:

On request of a party in interest, the bankruptcy court shall, and on the bankruptcy court's own motion, the bankruptcy court may protect an entity with respect to a trade secret or confidential research, development, or commercial information[.]

11 U.S.C. § 107(b)(1); *see* Fed. R. Bankr. P. 9018 (same).

16. Additionally, section 107(c)(1) of the Bankruptcy Code provides:

The bankruptcy court, for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property:

- (A) Any means of identification (as defined in section 1028(d) of title 18 [of the United States Code]) contained in a paper filed, or to be filed, in a case under th[e Bankruptcy Code].
- (B) Other information contained in a paper described in subparagraph (A).

11 U.S.C. § 107(c)(1).

17. As a result of the foregoing, out of an abundance of caution, the Debtors respectfully submit that it is appropriate to authorize the Debtors to redact from any paper filed or to be filed with the Court in the Chapter 11 Cases, including the Creditor Matrix, the Top 20 List, the schedules of assets and liabilities and statements of financial affairs (the “**Schedules and Statements**”), and any related affidavits of service, the email addresses and home addresses of natural persons—including tenants in the Debtors' building, the Debtors' independent contractors, individual creditors and equity security holders, to the extent applicable, to ensure the Debtors are not exposed to potential civil liability and significant financial penalties.

18. In addition, disclosing such information could be used by third parties to, among other things, perpetrate identity theft or locate survivors of domestic violence or stalking who have otherwise taken steps to conceal their whereabouts. This risk is not merely speculative. In at least one chapter 11 case, the abusive former partner of a debtor's employee exploited the publicly accessible creditor and employee information filed in the chapter 11 case to track the employee to her new address, which had not been publicly available until then, forcing the employee to change addresses again for her safety.⁶ The Debtors propose to provide an unredacted version of the Creditor Matrix and Top 20 List and any other redacted, applicable filings to this Court, the U.S. Trustee, counsel to any statutory committee appointed in the Chapter 11 Cases, and other parties in interest upon reasonable request (email being sufficient) to the Debtors or this Court that is reasonably related to these Chapter 11 Cases.

19. Courts in this district have stressed the importance of authorizing debtors to redact individual creditors' personally identifiable information, including home addresses in particular. In overruling an objection by the U.S. Trustee in *Art Van Furniture* to relief similar to that which is being requested herein, Judge Sontchi noted that the proposed redaction is not a "burden of proof" issue so "much as a commonsense issue." Hr'g Tr. at 25:6–7, *In re Art Van Furniture, LLC*, No. 20-10553 (CSS) (Bankr. D. Del. Mar. 10, 2020) [Docket No. 82].⁷ Judge Sontchi found that

⁶ The incident, which took place during the first Charming Charlie chapter 11 proceedings in 2017, is described in the "creditor matrix motion" filed in *In re Charming Charlie Holdings, Inc.*, Case No. 19-11534 (CSS) (Bankr. D. Del. Jul. 11, 2019) [Docket No. 4].

⁷ Similarly, Judge Sontchi previously overruled the U.S. Trustee's objection to the redaction of individuals' information and found that "it's just plain common sense in 2019—soon to be 2020—to put as little information out as possible about people's personal lives to present [sic] scams . . . [Identity theft] is a real-life issue, and, of course, the issue of domestic violence is extremely important." Hr'g Tr. at 48:20–22, 49:3–5, *In re Anna Holdings*, No. 19-12551 (CSS) (Bankr. D. Del. Dec. 3, 2019) [Docket No. 112].

Notably, Judge Sontchi acknowledged that "the world is very different from [the 1980s] when you and I started practice with the problems of identity theft" and that his perspective had evolved in that he was not previously aware of "the dangers with this kind of information becoming public." See Hr'g Tr. at 45:25-46:2, 47:22–24. The

“[a]t this point and given the risks associated with having any kind of private information out on the internet, [redaction] has really become routine [and] I think obvious relief.” *Id.* at 25:13–16. Similarly, in *Clover Technologies*, Judge Owens overruled the U.S. Trustee’s objection, noting that:

[t]o me it is common sense. I don’t need evidence that there is, at best, a risk of identity theft and worse a risk of personal injury from listing someone’s name and address on the internet by way of the court’s electronic case filing system and, of course, the claims agent’s website The court can completely avoid contributing to the risk by redacting the addresses. And while there is, of course, an important right of access we routinely redact sensitive and confidential information for corporate entities and redact individual’s home addresses.

Hr’g Tr. at 24:21-25, 25:9-10, *In re Clover Techs. Grp., LLC*, No. 19-12680 (KBO) (Bankr. D. Del. Jan. 22, 2020) [Docket No. 146]. And, in *Forever 21*, in overruling the U.S. Trustee’s objection, Judge Gross found that “[w]e live in a new age in which the theft of personal identification is a real risk, as is injury to persons who, for personal reasons, seek to have their addresses withheld.” Hr’g Tr. at 60:22–25, *In re Forever 21, Inc.*, No. 19-12122 (KG) (Bankr. D. Del. Dec. 19, 2019) [Docket No. 605].

20. For these reasons, the Debtors respectfully submit that cause exists to authorize the Debtors to seal, pursuant to 11 U.S.C. § 107(c)(1), personally identifiable information—including email addresses and home addresses—listed on the Creditor Matrix, Top 20 List, any related affidavits of service, or any other document filed with this Court. Absent such relief, the Debtors would unnecessarily render individuals more susceptible to identity theft and could jeopardize the safety of individuals by publishing their home addresses.

Debtors reserve the right to supplement the record with respect to such risks insofar as they are not self-evident in this instance.

COMPLIANCE WITH LOCAL RULE 9018-1(d)(iii)

21. Under the circumstances, and given the nature of the relief requested herein, the Debtors have not been able to confer with the individuals whose information is requested to be sealed and, accordingly, the Debtors submit that there is cause to excuse the Debtors from the meet and confer obligations under Local Rule 9018-1(d).

NOTICE

22. Notice of this Motion will be given to: (a) the Office of the United States Trustee for the District of Delaware; (b) the Internal Revenue Service; (c) the Securities and Exchange Commission; (d) the parties included on the Debtors' consolidated list of their twenty (20) largest unsecured creditors; (e) counsel to the DIP Lender and Prepetition Lender, Hogan Lovells US LLP, (i) 1999 Avenue of the Stars, Suite 1400, Los Angeles, California 90067 (Attn: Richard Wynne, Esquire and David P. Simonds, Esquire) (Email: richard.wynne@hoganlovells.com and david.simonds@hoganlovells.com); (f) the Office of the United States Attorney for the District of Delaware; (g) the office of the attorney general for each of the states in which the Debtors operate; (h) the United States Department of Justice; and (i) any party that has requested notice pursuant to Bankruptcy Rule 2002. As this Motion is seeking "first day" relief, notice of this Motion and any order entered in connection with the Motion will be served on all parties as required by Local Rule 9013-1(m). Due to the urgency of the circumstances surrounding this Motion and the nature of the relief in it, the Debtors respectfully submit that no further notice of this Motion is required.

NO PRIOR REQUEST

23. No previous request for the relief sought herein has been made to this Court or any other court.

CONCLUSION

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

Dated: November 12, 2025
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Alison R. Maser

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*Proposed Counsel for Debtors and
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EXHIBIT A

(Proposed Order)

**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.	(Jointly Administered)
	Related to Docket No. ____

**ORDER (I) AUTHORIZING DEBTORS TO (A) FILE A CONSOLIDATED LIST OF CREDITORS IN LIEU OF SUBMITTING A SEPARATE MAILING MATRIX FOR EACH DEBTOR; (B) FILE A CONSOLIDATED LIST OF TOP TWENTY (20) LARGEST UNSECURED CREDITORS; AND (C) REDACT CERTAIN PERSONALLY IDENTIFIABLE INFORMATION OF NATURAL PERSONS;
AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “**Motion**”)² of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**,”) for entry of an order (this “**Order**”), (i) authorizing the Debtors to (a) file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each Debtor, (b) file a consolidated list of the Debtors’ twenty (20) largest general unsecured creditors, and (c) redact certain personally identifiable information of natural persons; and (ii) granting related relief; and upon consideration of the First Day Declaration; and the Court having jurisdiction to consider the Motion and the relief requested therein 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 the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and the Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of this proceeding and the Motion

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.

2 Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion or First Day Declaration, as applicable.

being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice of the Motion having been given under the particular circumstances; and a hearing having been held to consider the relief requested in the Motion (the “**Hearing**”); and upon the record of the Hearing and all proceedings before this Court; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties-in-interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.
2. The requirement of Local Rule 2002-1(f)(v) that each Debtor, or its duly retained agent, maintain a separate creditor mailing matrix, is hereby waived. The Debtors are authorized to submit a consolidated creditor matrix in satisfaction of Local Rule 1007-2(a); *provided, however*, that if any of the Chapter 11 Cases convert to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor shall file its own creditor matrix and provide same to the Clerk’s office within fourteen (14) days of any such conversion.
3. The Debtors are authorized to file a consolidated list of the twenty (20) largest unsecured creditors in these Chapter 11 Cases in lieu of each Debtor filing a list of its twenty (20) largest unsecured creditors as required under Bankruptcy Rule 1007(d); *provided, however*, that if any of the Chapter 11 Cases convert to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor shall file a list of its twenty (20) largest creditors within fourteen (14) days of such conversion.
4. The Debtors are authorized, pursuant to section 107(c)(1) of the Bankruptcy Code, to redact on the Creditor Matrix, the Schedules and Statements, the Top 20 List, affidavits of

service, and any other documents filed with the Court, the home and email addresses of natural persons, including individual creditors and individual equity holders and all personally identifiable information of minors. The Debtors shall provide an unredacted version of the Creditor Matrix, the Schedules and Statements, the Top 20 List, and any other filings redacted pursuant to this Order to (a) the Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in these Chapter 11 Cases, (d) the claims and noticing agent, and (e) any party in interest upon a request to the Debtors (email is sufficient) or to the Court that is reasonably related to these Chapter 11 Cases; *provided* that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request unless otherwise required to be disclosed by law or court order. The Debtors shall inform the U.S. Trustee promptly after denying any request for an unredacted document pursuant to this Order.

5. Nothing herein precludes a party in interest's right to file a motion requesting that the Court unseal the information redacted by this Order.

6. The Debtors shall file a redacted version of the Creditor Matrix, Schedule and Statements, or other document filed with the Court as well as post it on the website of the Debtors' claims and noticing agent.

7. For the avoidance of doubt, the Debtors shall file an unredacted Creditor Matrix under seal with the Court.

8. Nothing in this Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any natural person whose personally identifiable information is sealed or redacted pursuant to this Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Order shall be confirmed in the corresponding certificate of service.

9. When serving any notice in these cases on the natural persons whose personally identifiable information is sealed or redacted pursuant to this Order, the claims and noticing agent and, where applicable, the Clerk of the Court, shall use such natural persons' residential addresses.

10. To the extent a party in interest files a document in these Chapter 11 Cases that is required to be served on creditors whose information is under seal pursuant to this Order, such party in interest should contact counsel for the Debtors who shall work in good faith, with the assistance of the claims and noticing agent, to effectuate the service on such party's behalf.

11. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Local Rules are satisfied by such notice.

12. Notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon entry.

13. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order in accordance with the Motion.

14. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.