

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

Hudson 1701/1706, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-11853 (KBO)

(Jointly Administered)

Related to Docket Nos. 58 and 69

**CERTIFICATION OF COUNSEL REGARDING  
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**

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

1. On November 12, 2025, the Debtors filed the *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* [Docket No. 58] (the “**Motion**”). Attached to the Motion as Exhibit A was a proposed order (the “**Proposed Order**”).

2. Prior to the hearing on the Motion scheduled for November 17, 2025 (the “**Hearing**”), the Debtors received informal comments from the Office of the United States Trustee (the “**U.S. Trustee**”).

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<sup>1</sup> 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’ mailing address is c/o FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.



3. On November 17, 2025, the Debtors filed the *Notice of Filing of Revised Proposed Order for the 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* [D.I. 69].

4. At the Hearing, the Court had further revisions to the Proposed Order. A revised form of order (the “**Revised Proposed Order**”) incorporating both the Court’s revisions and the U.S. Trustee’s comments is attached hereto as **Exhibit A**. Attached as **Exhibit B** is a blackline of the Revised Proposed Order against the Proposed Order.

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

Dated: November 17, 2025  
Wilmington, Delaware

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ Mark D. Olivere  
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*Proposed Counsel to the Debtors*

# **EXHIBIT A**

## **Revised Order**

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

In re:

Hudson 1701/1706, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-11853 (KBO)

(Jointly Administered)

**Related to Docket No. 58**

**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**”)<sup>2</sup> 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

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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’ mailing address is c/o FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

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 or to be filed with the Court by the Debtors, the home address 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.

# **EXHIBIT B**

## **Redline Order**



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with Article III of the United States Constitution; and venue of this proceeding and the Motion 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

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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 or to be filed with the Court by the Debtors, the home ~~and email-addresses~~address 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.

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whose personally identifiable information is sealed or redacted pursuant to this Order shall be confirmed in the corresponding certificate of service.

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

<b>Summary report:</b> <b>Litera Compare for Word 11.9.1.1 Document comparison done on</b> <b>11/17/2025 2:50:37 PM</b>	
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<b>Intelligent Table Comparison:</b> Active	
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<b>Modified filename:</b> Hudson -Original Proposed Order Creditor Matrix Redaction Motion.docx	
<b>Changes:</b>	
<u>Add</u>	5
<del>Delete</del>	4
<del>Move From</del>	0
<u>Move To</u>	0
<u>Table Insert</u>	0
<del>Table Delete</del>	0
<u>Table moves to</u>	0
<del>Table moves from</del>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
<b>Total Changes:</b>	9