

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)

Hearing Date: December 12, 2025, at 10:00 a.m. (ET)

Objection Deadline: December 5, 2025, at 4:00 p.m. (ET)

**NOTICE OF MOTIONS AND HEARING**<sup>2</sup>

TO: THE OFFICE OF THE UNITED STATES TRUSTEE FOR REGION 3; THE OFFICE OF THE UNITED STATES ATTORNEY FOR THE DISTRICT OF DELAWARE; THE HOLDERS OF THE 20 LARGEST UNSECURED CLAIMS AGAINST THE DEBTORS (ON A CONSOLIDATED BASIS); THE INTERNAL REVENUE SERVICE; COUNSEL TO PARKVIEW FINANCIAL REIT, LP; THE ATTORNEY GENERAL FOR EACH STATE IN WHICH THE DEBTORS OPERATE; THE DEBTORS' LANDLORD, MSP CAPITAL INVESTMENTS, L.L.C.; ANY PARTY THAT HAS REQUESTED NOTICE PURSUANT TO BANKRUPTCY RULE 2002; AND ANY OTHER PARTY ENTITLED TO NOTICE UNDER LOCAL RULE 9013-1.

**PLEASE TAKE NOTICE** that on November 12, 2025, the above-captioned debtors and debtors in possession (collectively, the "**Debtors**") filed the following pleadings (the "**First Day Motions**"):

1. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral; (II) Granting Adequate Protection to Prepetition Lender; (III) Modifying the Automatic Stay; (IV) Scheduling A Final Hearing and (V) Granting Related Relief [[Docket No. 56; Filed November 12, 2025](#)].
2. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance Coverage Entered into Prepetition and Pay Related Prepetition Obligations, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, (II) Authorizing Banks to Honor Related Checks and Transfers, and (III) Granting Related Relief [[Docket No. 57; Filed November 12, 2025](#)].

<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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the First Day Motions.



3. 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; Filed November 12, 2025](#)].
4. Debtors' Motion for Entry of Interim and Final Orders (I)(A) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief [[Docket No. 59; Filed November 12, 2025](#)].
5. Amended and Restated Declaration of Alan Tantleff in Support of Debtors' Chapter 11 Petitions and First Day Motions [[Docket No. 60; Filed November 12, 2025](#)]

**PLEASE TAKE FURTHER NOTICE** that on November 17, 2025, the Court entered the interim orders (the “**Interim Orders**”) at Docket Nos. 75, 76, and 82 granting the First Day Motions on an interim basis as set forth in such Interim Orders.

**PLEASE TAKE FURTHER NOTICE** that Objections, if any, to the final relief requested in the First Day Motions must be filed with the United States Bankruptcy Court, 824 North Market Street, Third Floor, Wilmington, Delaware 19801, on or before **December 5, 2025, at 4:00 p.m. (Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the objection as follows: (a) the Debtors, Hudson 1701/106, LLC, c/o FTI Consulting 1166 Avenue of the Americas, 15th Floor, New York, NY 10036 (Attn: Alan Tantleff) (Email: [alan.tantleff@fticonsulting.com](mailto:alan.tantleff@fticonsulting.com)); (b) proposed counsel for the Debtors, Chipman Brown Cicero & Cole, LLP, Hercules Plaza, 1313 North Market Street, Suite 5400, Wilmington, Delaware 19801 (Attn: William E. Chipman, Jr., Esquire and Mark D. Olivere, Esquire) (Email: [chipman@chipmanbrown.com](mailto:chipman@chipmanbrown.com) and [olivere@chipmanbrown.com](mailto:olivere@chipmanbrown.com)); (c) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lock Box 35, Wilmington, Delaware 19801 (Attn: Malcom M. Bates, Esquire) (Email: [malcom.m.bates@usdoj.gov](mailto:malcom.m.bates@usdoj.gov)); (d) 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](mailto:richard.wynne@hoganlovells.com) and [david.simonds@hoganlovells.com](mailto:david.simonds@hoganlovells.com)); and (ii) 390 Madison Avenue, New York, New York, 10017 (Attn.: Christopher Bryant, Esquire) (Email: [chris.bryant@hoganlovells.com](mailto:chris.bryant@hoganlovells.com)); and (e) counsel to any official committee appointed in these chapter 11 cases, so as to be **received no later than 4:00 p.m. (Eastern Time) on December 5, 2025**.

**PLEASE TAKE FURTHER NOTICE THAT A FINAL HEARING ON THE FIRST DAY MOTIONS WILL BE HELD ON DECEMBER 12, 2025, AT 10:00 A.M. (EASTERN TIME) BEFORE THE HONORABLE KAREN B. OWENS, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, SIXTH FLOOR, COURTROOM 3, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE FINAL RELIEF REQUESTED IN THE FIRST DAY MOTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE FINAL RELIEF REQUESTED IN THE FIRST DAY MOTIONS WITHOUT FURTHER NOTICE OR HEARING.**

Dated: November 18, 2025  
Wilmington, Delaware

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ William E. Chipman, Jr.

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*Proposed Counsel to the Debtors and Debtors in Possession*