

**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)

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

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

**APPLICATION OF THE DEBTORS FOR ENTRY OF AN ORDER
AUTHORIZING THE RETENTION AND EMPLOYMENT OF
CHIPMAN BROWN CICERO & COLE, LLP AS COUNSEL TO
THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned, jointly administered bankruptcy cases (the “**Chapter 11 Cases**”), hereby submit this application (the “**Application**”) pursuant to sections 327(a), 328(a), and 1107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”), Rules 2014(a), 2016(b), and 5002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), authorizing the retention and employment of Chipman Brown Cicero & Cole, LLP (“**CBCC**” or the “**Firm**”), as general bankruptcy counsel to the Debtors effective as of the Petition Date (as defined herein). The facts and circumstances supporting this Application are set forth herein, in the declaration of William E. Chipman, Jr. (the “**Chipman Declaration**”), attached hereto as **Exhibit B**, and the declaration of Alan Tantleff (the “**Tantleff Declaration**”), attached hereto as **Exhibit C**, which are incorporated herein by reference.

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.



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JURISDICTION, VENUE, AND STATUTORY PREDICATES

1. 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). Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final judgment or order with respect to this Application if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

2. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief sought herein are sections 327(a), 328(a), 329, and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016(b), and 5002, and Local Rules 2014-1 and 2016-1.

BACKGROUND

4. 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 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).

5. 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.

6. To date, no request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases, and no official committee of unsecured creditors has been appointed in these Chapter 11 Cases.

7. Additional factual background regarding the Debtors' business operations, corporate and capital structures, and restructuring efforts are described in greater detail in the *Amended and Restated Declaration of Alan Tantleff in Support of Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 60] (the "**First Day Declaration**"), which is incorporated herein by reference.

RELIEF REQUESTED

8. By this Application, the Debtors respectfully request that this Court enter an order, substantially in the form attached hereto, authorizing the employment and retention of CBCC as their counsel in these Chapter 11 Cases effective as of the Petition Date.

CBCC'S QUALIFICATIONS

9. The Debtors seek to retain CBCC because of the firm's extensive experience and knowledge in the fields of debtors and creditors' rights, business reorganizations and liquidations under chapter 11 of the Bankruptcy Code, its expertise, experience, and knowledge practicing before this Court, its proximity to the Court and its ability to respond quickly to emergency hearings and other emergency matters in this Court. Accordingly, the Debtors have determined that CBCC has the resources and experience necessary to represent them in these cases. The Debtors believe that CBCC's employment is in the best interest of the Debtors, their estates and their creditors. Thus, the Debtors desire that CBCC represent them in connection with these Chapter 11 Cases.

SCOPE OF EMPLOYMENT

10. The professional services that CBCC expects to render to the Debtors includes, but shall not be limited to, the following:

- (a) providing legal advice with respect to the Debtors' powers and duties as debtors-in-possession in the continued operation of their business and management of their properties;

- (b) negotiating, drafting, and pursuing all documentation necessary in these Chapter 11 Cases;
- (c) preparing on behalf of the Debtors all applications, motions, answers, orders, reports, and other legal papers necessary to the administration of the Debtors' estates;
- (d) appearing in Court and protecting the interests of the Debtors before the Court;
- (e) assisting with any disposition of the Debtors' assets, by sale or otherwise;
- (f) negotiating and taking all necessary or appropriate actions in connection with a plan or plans of reorganization and all related documents thereunder and transactions contemplated therein;
- (g) attending all meetings and negotiating with representatives of creditors, the United States Trustee, and other parties-in-interest;
- (h) providing legal advice regarding bankruptcy law, litigation and other issues to the Debtors in connection with the Debtors' ongoing business operations; and
- (i) performing all other legal services for, and providing all other necessary legal advice to, the Debtors, which may be necessary and proper in these Chapter 11 Cases.

11. Subject to the Court's approval of this Application, CBCC has indicated that it is willing to serve as counsel to the Debtors in these Chapter 11 Cases and to perform the services described above.

PROFESSIONAL COMPENSATION

12. Section 328(a) of the Bankruptcy Code authorizes the employment of a professional person on any reasonable terms and conditions of employment, including on an hourly basis. *See* 11 U.S.C. § 328(a). CBCC intends to apply for compensation for professional services rendered in connection with these Chapter 11 Cases subject to the approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of this Court, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by CBCC. CBCC has advised the Debtors that the current hourly rates

applicable to the principal attorneys and paralegals proposed to represent the Debtors are as follows:

PROFESSIONAL	RATE PER HOUR
William E. Chipman, Jr.	\$950.00
Mark D. Olivere	\$600.00
Alison R. Maser	\$400.00
Maria E. Whalen	\$350.00

13. Other attorneys and paralegals will render services to the Debtors as needed. As of the date of the Chipman Declaration, CBCC's current hourly rates range from \$545.00 to \$950.00 per hour for partners, \$395.00 to \$595.00 per hour for associates and counsel, and \$300.00 to \$350.00 per hour for paralegals. The Debtors understand that the hourly rates set forth above are subject to periodic adjustments in the ordinary course of business.

14. The hourly rates set forth above are CBCC's standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate CBCC for its work and to cover fixed and routine overhead expenses. It is CBCC's policy to charge its clients in all areas of practice for expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, photocopying, witness fees, travel expenses, certain secretarial and other overtime expenses, filing and recording fees, long distance telephone calls, postage, express mail and messenger charges, computerized legal research charges and other computer services, expenses for "working meals," and telecopier charges. CBCC will charge the Debtors for these expenses in a manner and at rates consistent with charges made generally to its other clients, subject to this Court's approval of such expenses pursuant to the Bankruptcy Code, such Bankruptcy Rules as may from time to time be applicable, such Local Rules as may from time to

time be applicable, and such procedures as may be fixed by order of this Court. CBCC believes that failure to charge these expenses would require the firm to increase its current hourly rates.

PAYMENTS AND RETAINERS RECEIVED PRIOR TO THE PETITION DATE

15. On October 21, 2025, CBCC received a retainer payment from the Debtors totaling \$100,000.00 (the “**Retainer**”). The Retainer secured the payment of fees for legal services rendered and expenses incurred by CBCC prior to the Petition Date. CBCC applied the Retainer to its prepetition fees and expenses existing as of the Petition Date. After application of the Retainer to prepetition fees and expenses, CBCC continues to hold \$84,499.00 in the Retainer. CBCC will hold this Retainer in its IOLTA account and to be applied against approved unpaid fees and expenses following a final hearing with respect to the fees and expenses of CBCC in the Chapter 11 Cases.

16. In the one-year period prior to the Petition Date, CBCC incurred no other fees and expenses in its representation of the Debtors with respect to the Debtors’ efforts to pursue strategic alternatives and prepare for the commencement of the Chapter 11 Cases.

17. The Firm’s statement, pursuant to Bankruptcy Rule 2016, of the compensation paid for services rendered by CBCC in the one-year period preceding the Petition Date, and the source of such compensation, is set forth in the Chipman Declaration.

STATEMENT REGARDING U.S. TRUSTEE GUIDELINES

18. CBCC will file fee applications with the Court in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of this Court, and be paid pursuant thereto. CBCC will make a reasonable effort to comply with the requests from the Office of the United States Trustee for the District of Delaware for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for*

Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the “**UST Guidelines**”).

19. The following paragraph is provided in response to Paragraph D.1 of the UST Guidelines:

Question Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?

Response No. CBCC professionals working on this matter will bill at the Firm’s standard hourly rates.

Question Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?

Response No.

Question If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the twelve months prepetition. If your billing rates and material financial terms have changed postpetition, explain the differences and the reasons for the differences.

Response N/A

Question Has your client approved your prospective budget and staffing plan, and, if so, for what budget period?

Response A preliminary prospective budget and staffing plan for the postpetition period that includes CBCC as well as the Debtors’ other advisors has been approved by the Debtors. In accordance with the UST Guidelines, the budget may be amended or supplemented, as necessary, to reflect changed or unanticipated developments.

DISINTERESTEDNESS

20. To the best of the Debtors’ knowledge and as disclosed herein and in the Chipman Declaration: (a) CBCC is a “disinterested person” under section 101(14) of the Bankruptcy Code; (b) CBCC does not hold or represent an interest adverse to the Debtors’ estates; and (c) CBCC’s partners, counsel and associates have no connection to the Debtors, their creditors or their related parties except as may be disclosed in the Chipman Declaration.

BASIS FOR RELIEF

21. Section 327(a) of the Bankruptcy Code provides that:

Except as otherwise provided in this section, the trustee, with the court's approval, may employ one or more attorneys, accountants, appraisers, auctioneers, or other professional persons, that do not hold or represent an interest adverse to the estate, and that are disinterested persons, to represent or assist the trustee in carrying out the trustee's duties under this title.

11 U.S.C. § 327(a).

22. Moreover, Bankruptcy Rule 2014(a) requires that a retention application include:

[S]pecific facts showing the necessity for the employment, the name of the person to be employed, the reasons for the selection, the professional services to be rendered, any proposed arrangement for compensation, and, to the best of the applicant's knowledge, all of the person's connections with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

23. The Debtors have selected CBCC as their counsel because of CBCC's extensive experience and knowledge in the field of debtor and creditor rights and business reorganizations under chapter 11 of the Bankruptcy Code. Thus, the Debtors believe that CBCC is the best qualified law firm to act as general bankruptcy counsel for the Debtors in connection with these Chapter 11 Cases. As set forth in the Chipman Declaration: (a) CBCC does not represent or hold any interest adverse to the Debtors or their estates; and (b) CBCC constitutes a "disinterested person" for purposes of section 327(a) of the Bankruptcy Code. Accordingly, the Debtors submit that retention of CBCC effective as of the Petition Date is in the best interests of the Debtors, their estates, their creditors, and all other parties-in-interest.

BANKRUPTCY RULE 5002

24. As set forth in the Chipman Declaration, no partner, counsel or associate of CBCC is a relative of, or has been so connected with, any United States Bankruptcy Judge for the District

of Delaware, any of the District Court Judges for the District of Delaware who handle bankruptcy cases, the United States Trustee for Region 3, the Assistant United States Trustee for the District of Delaware, the attorney for the U.S. Trustee assigned to these Chapter 11 Cases or any other employee of the U.S. Trustee. Accordingly, the appointment of CBCC is not prohibited by Bankruptcy Rule 5002.

**REQUEST FOR APPROVAL OF RETENTION OF CBCC
EFFECTIVE AS OF THE PETITION DATE**

25. The Debtors request that CBCC's retention be made effective as of the Petition Date in order to allow CBCC to be compensated for the work it performs for the Debtors as of and following the Petition Date and prior to the Court's consideration of this Application. On the Petition Date, CBCC turned its attention to urgent matters including, but not limited to, finalizing and filing the first-day pleadings and preparing for the first-day hearing. The Debtors submit that under the circumstances, and to avoid irreparable harm to the Debtors' estates that may occur if CBCC is not immediately retained, retroactive approval to the Petition Date is warranted. *See, e.g., Matter of Arkansas Co.*, 798 F.2d 645, 650 (3d Cir. 1986); *F/S Airlease II, Inc. v. Simon (In re F/S Airlease II, Inc.)*, 844 F.2d 99, 103 (3d Cir. 1988), cert. denied, 488 U.S. 852 (1988); *Indian River Homes, Inc. v. Sussex Trust Co.*, 108 B.R. 46, 51 (D. Del. 1989) (approval of debtor's employment of attorney and real estate agent as of a prior date was not an abuse of discretion).

NOTICE AND NO PRIOR REQUEST

26. Notice of this Application will be given to: (a) the Office of the United States Trustee for the District of Delaware; (b) the holders of the 20 largest unsecured claims against the Debtors (on a consolidated basis); (c) counsel to Parkview Financial REIT, LP; and (d) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors respectfully submit that, in light of the nature of the relief requested, no other or further notice need be given.

27. No prior request for the relief sought in this Application has been made to this or any other court.

WHEREFORE, the Debtors respectfully request that this Court enter an order granting the relief requested herein and such other and further relief as is just and proper.

Dated: November 21, 2025

**HUDSON 1701/1706, LLC AND ITS AFFILIATES
THAT ARE DEBTORS AND DEBTORS IN
POSSESSION**

/s/ Alan Tantleff
Alan Tantleff
Co-Chief Restructuring Officer

Exhibit A

Proposed Order

**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)

Related to Docket No. _____

**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF
CHIPMAN BROWN CICERO & COLE, LLP AS COUNSEL
TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

Upon the application (the “**Application**”)² of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”) pursuant to sections 327(a), 328(a) and 1107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”), Rules 2014(a), 2016(b), and 5002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), authorizing the retention and employment of Chipman Brown Cicero & Cole, LLP (“**CBCC**” or the “**Firm**”) as general bankruptcy counsel to the Debtors effective as of the Petition Date; the Court, having reviewed the Application and the Chipman Declaration, finds that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, that this is a core matter pursuant to 28 U.S.C. § 157(b)(2), that notice of the Application was sufficient under the circumstances, and that no further notice need be given; and the legal and factual bases set forth in the Application established just cause for the relief granted herein, it is **HEREBY ORDERED THAT:**

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 All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

1. For the reasons set forth herein, the Application is GRANTED.
2. Pursuant to sections 327(a), 328(a) and 1107(b) of the Bankruptcy Code, Rules 2014(a), 2016(b) and 5002, and Local Rule 2014-1, the Debtors are authorized to retain and employ CBCC as general bankruptcy counsel effective as of the Petition Date.
3. CBCC shall be compensated in accordance with the procedures set forth in the Application, sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and Orders of this Court.
4. CBCC shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013*.
5. CBCC shall provide ten business days' notice to the Debtors, the U.S. Trustee, and any official committee appointed in the Chapter 11 Cases before any increases in the rates set forth in the Application are implemented and shall file such notice with the Court. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including, but not limited to, the reasonableness standard provided in Bankruptcy Code section 330, and the Court retains the right to review any rate increase pursuant to Bankruptcy Code section 330.
6. To the extent that there may be any inconsistency between the terms of the Application, the Chipman Declaration, and this Order, the terms of this Order shall govern.
7. Notwithstanding anything in the Application to the contrary, CBCC shall not be entitled to recover any attorney fees or expenses for defending its fee applications in these cases.
8. CBCC shall make reasonable efforts to avoid the duplication of services provided by any of the Debtors' other retained Professionals in these Chapter 11 Cases.

9. The terms of this Order shall be immediately effective and enforceable upon its entry.

10. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to the interpretation or implementation of this Order.

Exhibit B

Chipman Declaration

**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)

**DECLARATION OF WILLIAM E. CHIPMAN, JR. IN SUPPORT OF APPLICATION
OF THE DEBTORS FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION
AND EMPLOYMENT OF CHIPMAN BROWN CICERO & COLE, LLP AS COUNSEL
TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

I, William E. Chipman, Jr., hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury as follows:

1. I am a partner in the law firm of Chipman Brown Cicero & Cole, LLP (“**CBCC**” or the “**Firm**”), which maintains its principal office at Hercules Plaza, 1313 North Market Street, Suite 5400, Wilmington, Delaware 19801. CBCC also maintains an office in New York, New York. I submit this declaration (the “**Declaration**”) on behalf of CBCC in support of the application (the “**Application**”),² of the above-captioned debtors and debtors-in-possession (the “**Debtors**”) for an order, pursuant to sections 327(a), 328(a), and 1107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”), Rules 2014(a), 2016(b), and 5002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), authorizing the retention and employment of CBCC as general bankruptcy counsel to the Debtors in the above captioned Chapter 11 Cases effective as of October 22, 2025 (the “**Petition**”).

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 them in the Application.

Date”). Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.³

2. The facts set forth below are based either upon my personal knowledge, discussions with other partners, counsel and associates of CBCC, or review of the client/matter records of CBCC by me or by associates of CBCC acting under my supervision and direction.

DEBTORS’ RETENTION OF CBCC

3. The Debtors have filed the Application to retain CBCC, subject to this Court’s approval, as bankruptcy counsel to the Debtors. The professional services that CBCC expects to render to the Debtors include, but are not limited to:

- (a) providing legal advice with respect to the Debtors’ powers and duties as debtors-in-possession in the continued operation of their business and management of their properties;
- (b) negotiating, drafting, and pursuing all documentation necessary in these Chapter 11 Cases;
- (c) preparing on behalf of the Debtors all applications, motions, answers, orders, reports, and other legal papers necessary to the administration of the Debtors’ estates;
- (d) appearing in Court and protecting the interests of the Debtors before the Court;
- (e) assisting with any disposition of the Debtors’ assets, by sale or otherwise;
- (f) negotiating and taking all necessary or appropriate actions in connection with a plan or plans of reorganization and all related documents thereunder and transactions contemplated therein;
- (g) attending all meetings and negotiating with representatives of creditors, the United States Trustee, and other parties-in-interest;
- (h) providing legal advice regarding bankruptcy law, litigation, and other issues to the Debtors in connection with the Debtors’ ongoing business operations; and
- (i) performing all other legal services for, and providing all other necessary legal advice to, the Debtors that may be necessary and proper in these Chapter 11 Cases.

³ Certain of the disclosures herein relate to matters within the knowledge of other attorneys at CBCC.

4. CBCC has the resources and experience necessary to represent the Debtors in these Chapter 11 Cases as bankruptcy counsel because of CBCC's extensive experience and knowledge in the fields of debtor and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code.

PROFESSIONAL COMPENSATION

5. CBCC intends to apply for compensation for professional services rendered in connection with these Chapter 11 Cases subject to the approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of this Court, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by CBCC. CBCC has advised the Debtors that the current hourly rates applicable to the principal attorneys and paralegals proposed to represent the Debtors are as follows:

PROFESSIONAL	RATE PER HOUR
William E. Chipman, Jr.	\$950.00
Mark D. Olivere	\$600.00
Alison R. Maser	\$400.00
Maria E. Whalen	\$350.00

6. Other attorneys and paralegals will render services to the Debtors as needed. As of the date of the Chipman Declaration, CBCC's current hourly rates range from \$545.00 to \$950.00 per hour for partners, \$395.00 to \$595.00 per hour for associates and counsel, and \$300.00 to \$350.00 per hour for paralegals. The Debtors understand that the hourly rates set forth above are subject to periodic adjustments in the ordinary course of business.

7. The hourly rates set forth above are CBCC's standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate CBCC for its work and to cover fixed and routine overhead expenses. It is CBCC's policy to charge its clients in all areas of practice for expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, photocopying, witness fees, travel expenses, certain secretarial and other overtime expenses, filing and recording fees, long distance telephone calls, postage, express mail and messenger charges, computerized legal research charges and other computer services, expenses for "working meals," and telecopier charges. CBCC will charge the Debtors for these expenses in a manner and at rates consistent with charges made generally to its other clients, subject to this Court's approval of such expenses pursuant to the Bankruptcy Code, such Bankruptcy Rules as may from time to time be applicable, such Local Rules as may from time to time be applicable, and such procedures as may be fixed by order of this Court. CBCC believes that failure to charge these expenses would require the firm to increase its current hourly rates.

PAYMENTS AND RETAINERS RECEIVED PRIOR TO THE PETITION DATE

8. On October 21, 2025, CBCC received a retainer payment from the Debtors totaling \$100,000.00 (the "**Retainer**"). The Retainer secured the payment of fees for legal services rendered and expenses incurred by CBCC prior to the Petition Date. CBCC applied the Retainer to its prepetition fees and expenses existing as of the Petition Date. After application of the Retainer to prepetition fees and expenses, CBCC continues to hold \$84,499.00 in the Retainer. CBCC will hold this Retainer in its IOLTA account and to be applied against approved unpaid fees and expenses following a final hearing with respect to the fees and expenses of CBCC in the Chapter 11 Cases.

9. In the one-year period prior to the Petition Date, CBCC incurred no other fees and expenses in its representation of the Debtors with respect to the Debtors' efforts to pursue strategic alternatives and prepare for the commencement of the Chapter 11 Cases.

10. CBCC intends to seek compensation for all time and expenses associated with its retention in accordance with sections 330 and 331 of the Bankruptcy Code and any orders of this Court, including the preparation of the Application, this Declaration and related documents, as well as any monthly fee statements or interim or final fee applications.

11. Other than as set forth herein, there is no proposed arrangement to compensate CBCC. CBCC has not shared, nor agreed to share: (a) any compensation it has received or may receive with any other party or person, other than with the partners and associates of CBCC; or (b) any compensation another person or party has received or may receive.

12. Consistent with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013*, I submit the following information:

- (a) CBCC did not agree to any variations from, or alternatives to, its standard or customary billing arrangements for this engagement;
- (b) None of CBCC's professionals included in this engagement have varied their rate based on the geographic location for these Chapter 11 Cases
- (c) CBCC has represented the Debtors since January 16, 2025, in connection with restructuring advice. The billing rates and material financial terms of CBCC's engagement have not changed postpetition from the prepetition arrangement; and
- (d) CBCC, in conjunction with the Debtors' advisors, has worked closely with the Debtors to develop an estimated budget and staffing plan for approximately the first thirteen (13) weeks of these proceedings.

13. The Debtors may also file motions or applications to employ additional professionals and/or ordinary course professionals. CBCC will work closely with the Debtors' other professionals to avoid any unnecessary duplication of effort.

14. By reason of the foregoing, I believe CBCC is eligible for employment and retention by the Debtors pursuant to sections 327(a), 328(a), and 1107(b) of the Bankruptcy Code and the applicable Bankruptcy Rules.

CBCC'S DISCLOSURE PROCEDURES

15. To the best of my knowledge and information after due inquiry, and except as disclosed herein: (a) CBCC has no interest adverse to the Debtors or to the Debtors' estates; and (b) CBCC is a "disinterested person" for purposes of section 327(a) of the Bankruptcy Code. For so long as CBCC represents the Debtors, and absent further order of this Court, CBCC will not represent any entity other than the Debtors in connection with the Chapter 11 Cases.

16. As more fully described hereinafter, CBCC maintains a computer client database (the "**Client Database**") containing the names of all of CBCC's current and former clients and, where practical, the known affiliates of those clients. In connection with preparing this Declaration, I caused to be submitted to, and caused to be checked against, the Client Database, those potentially interested parties in these cases listed on **Exhibit 1** hereto, which party names were provided to CBCC by the Debtors (collectively, the "**Potentially Interested Parties**"). CBCC compared the names of the Potentially Interested Parties against the Client Database. Based upon my review of the Potentially Interested Parties and the report from CBCC's Client Database, I have determined that CBCC has or had a relationship with certain Potentially Interested Parties as identified in CBCC's conflict check and disclosed on **Exhibit 2** attached hereto.

17. Through a firm wide email, CBCC solicited information from its attorneys to determine whether any attorneys employed by CBCC are related to the Bankruptcy Judge presiding over these cases, the United States Trustee for Region 3, or any attorney known to CBCC to be employed in the Wilmington Office of the United States Trustee. CBCC also solicited information from its attorneys to determine if any attorneys employed by CBCC are equity security

holders of the Debtors. Based upon this review, no such connections have been discovered to date. In the event that any additional information is received, CBCC will supplement this Declaration to the extent necessary.

18. CBCC maintains and systematically updates its Client Database in the ordinary course of business, and it is the regular practice of CBCC to make and maintain these records. The Client Database maintained by CBCC is designed to include every matter on which CBCC is now or has been engaged, the entity by which CBCC is now or has been engaged, and, in each instance, the identity of related parties, adverse parties, and the name of an attorney at CBCC who is knowledgeable about the matter. It is the policy of CBCC that no new matter may be accepted or opened without completing and submitting to those charged with maintaining the Client Database the information necessary to check each such matter for conflicts, including the identity of the prospective client, the matter, and related and adverse parties. Accordingly, the Client Database is regularly updated for every new matter undertaken by CBCC.

19. CBCC may have connections to certain creditors and other parties-in-interest in these cases. Those connections may include representation of the entity, an affiliate, or related party, as well as representation of parties adverse to such parties, affiliates, or related parties in matters unrelated to these cases. In addition, it is possible that CBCC and certain of its partners, counsel and associates may have in the past represented, may currently represent, and may in the future represent parties-in-interest of the Debtors in connection with matters unrelated to the Debtors or these cases. Moreover, CBCC appears in many cases, proceedings, and transactions involving different attorneys, financial consultants, and investment bankers, some of which may now or in the future represent the Debtors, Potentially Interested Parties or other parties-in-interest in these cases. From time to time, CBCC will supplement this Declaration to the extent necessary.

20. To the best of my knowledge, information and belief, CBCC does not represent or hold any interest adverse to the Debtors or their estates. Accordingly, I believe that CBCC satisfies the requirements for employment as counsel to the Debtors pursuant to section 327(a) of the Bankruptcy Code.

21. CBCC is a “disinterested person” as that term is defined in 11 U.S.C. § 101(14) in that CBCC, its partners, and associates;

- are not creditors, equity security holders, or insiders of the Debtors;
- are not and were not, within two (2) years before the date of the filing of the petitions, a director, officer, or employee of the Debtors; and
- do not have an interest materially adverse to the interest of the estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

22. CBCC and certain of its partners, counsel and associates may have in the past represented and may currently represent and likely in the future will represent creditors of the Debtors in connection with matters unrelated to the Debtors and these cases. At this time, CBCC is not aware of such representations, except as disclosed herein.

23. No partner, counsel or associate of CBCC is a relative of, or has been so connected with, any United States Bankruptcy Judge for the District of Delaware, any of the District Court Judges for the District of Delaware who handle bankruptcy cases, the United States Trustee for Region 3, the Assistant United States Trustee for the District of Delaware, the attorney for the U.S. Trustee assigned to these Chapter 11 Cases, or any other employee of the U.S. Trustee, except as set forth herein.

24. The facts set forth below are based either upon my personal knowledge, discussions with other partners and associates of CBCC, and client/matter records of CBCC reviewed by me or by associates of CBCC acting under my supervision and direction.

**REQUEST FOR APPROVAL OF RETENTION OF CBCC
EFFECTIVE AS OF THE PETITION DATE**

25. For the reasons stated in the Application, CBCC has requested, and the Debtors have agreed, that CBCC's retention be approved effective as of the Petition Date, in order to allow CBCC to be compensated for the work it has performed for the Debtors prior to the Court's consideration and approval of the Application.

26. By reason of the foregoing, I believe CBCC is eligible for employment and retention by the Debtors pursuant to sections 327(a), 328(a), and 1107(b) of the Bankruptcy Code and the applicable Bankruptcy Rules.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: November 21, 2025

/s/ William E. Chipman, Jr.
William E. Chipman, Jr.

EXHIBIT 1
LIST OF POTENTIALLY INTERESTED PARTIES

INTERESTED PARTIES LIST
Hudson 1701/1706, LLC

Debtors

Hudson 1701/1706, LLC
Hudson 1702, LLC

Non-Debtor Affiliate

Parkview Financial REIT, LP
PV Hudson LLC
Parkview Financial, LLC

Lender

Parkview Financial REIT, LP

Banks & Fin. Institution

Western Alliance Bancorporation
Flagstar Bank

Managers, Officers and Key Personnel

Robbin Itkin
Alan Tantleff
Andrew Hinkelman
Paul Rahimian
Ted Jung

Former Equity Holders/Management

Alberto Smeke Saba
Salomon Smeke Saba
CSC Hudson, LLC
Michelle A. Dreyer

Bankruptcy Professionals

DLA Piper
FTI Consulting, Inc.
Chipman Brown Cicero & Cole, LLP
Kurtzman Carson Consultantes, LLC dba Verita
Global

Broker & Insurers

Lloyd's of London
CAC Specialty
Arch Insurance Company
Landmark American Insurance Company
Amherst Specialty Insurance Company
Homeland Insurance Company of Delaware
Mesa Underwriters Specialty Insurance
Company

Syndicate 2623/623 at Lloyd's
Accelerant Specialty Insurance Company
Southwest Marine and General Insurance
Company
StarStone Specialty Insurance Company
Houston Specialty Insurance Company
Travelers Casualty and Surety Company of
America
Liberty Surplus Insurance Corporation
Syndicate 33 at Lloyd's, managed by Hiscox
Syndicates Limited
Kevin Muller
R-T Specialty
RSG Specialty, LLC
Beazley USA Services, Inc.
Quantum Specialty Group
Program Brokerage Corporation
BMS Group Ltd
Hub Int'l Northeast Ltd
AllState
Western Alliance Bancorporation
First American Title Insurance Company
IPFS of New York

Other Professionals

Landis Rath & Cobb LLP
Adler & Stachhenfeld LLP
Herrick, Feinstein LLP
Womble Bond Dickinson (US) LLP
Vedder Price P.C.
Pachulski Stang Ziehl & Jones LLP
Hogan Lovells US LLP
SchatzCo V LLC
Rivkin Radler LLP

Landlords & Lessors

356W58 Ground Lessor LLC
GLR Capital Investments, LLC
Montgomery Street Partners Capital
Investments, LLC
MSP Capital Investments, L.L.C.
GLP REIT Advisors, LLC
Ground Lease REIT Advisors, LLC
Fitness International, LLC

Mechanics Lienholders

Gardinier Theobald Inc.
Elysium Construction Inc.
Tritech Electrical Data Inc.
Alba Services, Inc.
Superior Chutes

Contractors

Taconic Development Advisors, LLC
Tri-Hill Management LLC
AES Lighting
HMS Abadi
Alba Services Inc.
Aqua Wall
Advanced Plumbing Corporation
Alba Electric Corp
Alba Façade
AJP Contracting Corporation
CMBM LLC
Chutes Express
DMV Mechanical
Elysium Construction Inc.
F.S. Site Corp.
Global Security
Graham Corporation
Harrys Construction Corp
Interstate Wood Floors Inc.
Junkluggers, LLC
Lawrence Glass, Inc.
Marco & M Home Solutions Corp.
Master Glass, Corp.
Maverick Industries Corp.
Mulligan Security LLC
Mincey Marble
NY Insulation
Noble Stone
Nouveau Elevator Industries LLC
Paladin Risk Management LTD
Perfectaire
R&A Painting Corp
RocLedge Manufactured Stone, LLC
Skyline Risk Management
Tri-State Construction Inc.
Tiger Cabinets Inc.
Universal Stone
V10 Specialties
Vulpis
RCN Telecom Services of New York, LP d/b/a
Astound Broadband
Advantage Wholesale Supply

CoinMac
Con Edison
Dial a Bug
Ditchik & Ditchik
Firecom Inc.
Gilbar
Johnson Control Security Solutions
Johnson Controls
Primo Water
Spectrum Business
TFP1 Inc d/b/a Total Fire Protection
Royal Abstract of New York, LLC
Apco Group, Inc.

Taxing and Governmental Authorities

City of New York
State of New York
New York Office of the Attorney General
New York State Department of Taxation and
Finance
Securities & Exchange Commission (D.C.
Address)
Securities and Exchange Commission (NY, NY
Address)
Internal Revenue Service
Delaware State Treasury
Delaware Secretary of State Delaware Office of
the Attorney General

Regulatory Bodies

New York City Department of Housing
Preservation and Development
New York City Department of Housing
Preservation and Development Inclusionary
Housing Unit
New York City Department of Buildings
New York City of Environmental Protection
New York City Department of Finance

Top 20

356W58 Ground Lessor
Fitness International, LLC
Alberto Smeke Saba
Saloman Smeke Saba
HUB
Nouveau Elevators
FS Site
Mulligan Security
DMV Mechanical

NY City Department of Environmental
Protection
Abadi
Firecom Inc.
Ditchik & Ditchik
Universal Stone
Lighting Workshop
Johnson Controls
AJP
Tiger Cabinets Inc.
Lawrence Glass
Nonstop Plumbing

Bankruptcy Judges and Staff

Judge Laurie Selber Silverstein
Judge John T. Dorsey
Judge Craig T. Goldblatt
Judge Thomas M. Horan
Judge Karen B. Owens
Judge Brendan L. Shannon
Judge J. Kate Stickles
Judge Mary F. Walrath
Stephen L. Grant, Sr
Lauren Attix
James R. O'Malley
Demitra Yeager
Nickita Barksdale
Amanda Hrycak
Danielle Gadson
Jill Walker
Rachel Bello
Paula Subda
Claire Brady
Marquietta Lopez
Laura Haney
Nikki Washington
Cacia Batts
Lora Johnson
Al Lugano

United States Trustee and Staff

Timothy J. Fox, Jr.
Benjamin Hackman
Hannah M. McCollum
Jane Leamy
Joseph McMahon
Linda Casey
Linda Richenderfer
Malcolm M. Bates
Michael Girello

Nyanquoi Jones
Shakima L. Dortch
Jonathan Lipshie
Jonathan Nyaku
Joseph Cudia
Holly Dice
Christine Green
Hawa Konde

Utilities

RCN Telecom Services of New York, LP d/b/a
Astound Broadband
Spectrum Business
Con Edison
Advantage Wholesale Supply

Litigation Parties

New York Hotel and Gaming Trades Council
Hector Luciano Gonzalez
Raymond Hickey and Tana Hickey

EXHIBIT 2**CBCC'S CONNECTIONS WITH POTENTIALLY INTERESTED PARTIES**

Potential Party in Interest	Relationship to Debtor	Firm Relationship
Liberty Surplus Insurance Corporation	Insurer	CBCC formerly represented “Liberty Surplus Insurance Corporation” in matters unrelated to the Debtors or these Chapter 11 Cases.

Exhibit C
Tantleff Declaration

**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)

**DECLARATION OF ALAN TANTLEFF IN SUPPORT OF APPLICATION OF THE
DEBTORS FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND
EMPLOYMENT OF CHIPMAN BROWN CICERO & COLE, LLP AS COUNSEL TO
THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

I, Alan Tantleff, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury as follows:

1. I am a Senior Managing Director and leader of the Hospitality, Gaming, and Leisure industry practice of FTI Consulting, Inc. (“FTI”), a leading global business advisory firm with over 50 offices worldwide and over 8,100 employees, where I specialize in, among other things, workouts and financial restructurings of lodging, hospitality, and commercial real estate businesses. I have over thirty (30) years of diverse, hands-on experience in areas of commercial real estate development, workouts and restructuring, asset management, structured debt and equity financing, and acquisitions and dispositions.

2. Before joining FTI, I was a Managing Director at Hotel Asset Value Enhancement, a boutique asset management and advisory practice dedicated to the hospitality industry. I also worked at BlackRock Financial Services, assisting the efforts in workouts and restructuring of the financial manager’s \$6 billion sub debt portfolio. I have previously held

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.

senior management positions at Jones Lang LaSalle, Granite Partners (Savills), The Prudential Insurance Company of America, and Sands Casino in Atlantic City.

3. I have earned numerous awards and accolades throughout my career, including GlobeStreet's 2025 "Rainmaker in CRE Debt, Equity & Finance," Crain's New York Business's 2023 Notable Leaders in Real Estate, Real Estate New York's Top "40 under 40" influential people in New York real estate and RealShare New York's "Commercial Broker All-Stars." Recently, I was named to Turnaround and Workout Magazine's "People to Watch," and National Real Estate Investor named me "Exit Strategy Guru" in an article about the timely disposition of hotel assets. I have authored numerous articles and columns in various trade and industry publications.

4. I hold an M.S. in Real Estate Investment and Development from New York University (1991) and a B.S. in Hotel Management, School of Hotel Administration, Cornell University (1987). I am a licensed real estate broker in The State of New York, a Certified Insolvency and Restructuring Advisor, and a Certified Turnaround Professional.

5. I submit this declaration (this "**Declaration**") in support of the *Application of Debtors for Entry of Order Authorizing the Retention and Employment of Chipman Brown Cicero & Cole, LLP as Counsel to Debtors, Effective as of the Petition Date* (the "**Application**")². Except as otherwise noted, all facts in this Declaration are based on my personal knowledge of the matters set forth herein, information gathered from my review of relevant documents, and information supplied to me by other members of the Debtors' management and the Debtors' advisors.

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

THE DEBTORS' SELECTION OF CBCC

6. Chipman Brown Cicero & Cole, LLP (“CBCC” or the “Firm”) is proposed to serve as general bankruptcy counsel to the Debtors.

7. The Debtors seek to retain CBCC as their general bankruptcy counsel because of the Firm’s extensive experience and knowledge in the field of debtors’ and creditors’ rights under chapter 11 of the Bankruptcy Code, and the Firm’s deep experience in matters concerning complex bankruptcy litigation.

8. CBCC is familiar with the Debtors and with many of the potential legal issues which may arise in the context of the Chapter 11 Cases and has the necessary background and knowledge to represent the Debtors in the Chapter 11 Cases in an effective and efficient manner.

RATE STRUCTURE

9. In my capacity as Co-CRO, my responsibilities extend to the supervision of counsel through the monitoring of costs, including legal costs, and I participate in monitoring and controlling costs of the business, including legal costs. CBCC has provided and will be providing professional services to the Debtors under its standard rate structure. CBCC has informed the Debtors that its rates under its standard rate structure are consistent among bankruptcy representations undertaken under the standard rate structure, including related transactional and litigation services. CBCC has further informed the Debtors that its rates and terms under its standard rate structure for non-bankruptcy engagements are the same as the rates and the terms for the Debtors’ engagement of CBCC. CBCC has informed the Debtors that the Firm’s standard hourly rates are subject to periodic adjustment in accordance with the Firm’s practice.

COST SUPERVISION

10. The Debtors and CBCC expect to develop a prospective budget and staffing plan, to comply with the U.S. Trustee’s requests for information and additional disclosures and with any

orders of the Court, recognizing that in the course of the Chapter 11 Cases, there may be unforeseeable fees and expenses that will need to be addressed by the Debtors and CBCC. The Debtors recognize that it is their responsibility to monitor closely the billing practices of their counsel to ensure that the fees and expenses paid by the estate remain consistent with the Debtors' expectations and the exigencies of the Chapter 11 Cases. The Debtors will continue to review the invoices that CBCC regularly submits, and, together with CBCC, periodically amend the budget and staffing plan as these Chapter 11 Cases develop.

11. As they did prepetition, the Debtors will endeavor to bring discipline, predictability, client involvement, and accountability to the fee and expense reimbursement process. While I understand that every chapter 11 case is unique, the budget to be prepared in accordance with the U.S. Trustee's fee guidelines will, I believe, provide guidance on the periods of time involved, the level of attorneys and professionals who will work on various matters, and projections of average hourly rates for the attorneys and professionals for various matters.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: November 21, 2025

/s/ Alan Tantleff

Name: Alan Tantleff

Title: Co-Chief Restructuring Officer

**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)

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

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

**NOTICE OF APPLICATION OF THE DEBTORS FOR ENTRY OF AN ORDER
AUTHORIZING THE RETENTION AND EMPLOYMENT OF
CHIPMAN BROWN CICERO & COLE, LLP AS COUNSEL TO
THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

PLEASE TAKE NOTICE that on November 21, 2025, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the *Application of the Debtors for Entry of an Order Authorizing the Retention and Employment of Chipman Brown Cicero & Cole, LLP as Counsel to the Debtors Effective as of the Petition Date* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Application, must be filed on or before **December 5, 2025, at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”) with the Court, 824 North Market Street, Third Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that at the same time, you must serve a copy of the response on (a) proposed counsel to the Debtors, Chipman Brown Cicero & Cole LLP, 1313 N. Market Street, Suite 5400, Wilmington, DE 19801 (Attn: William E. Chipman, Jr. and Mark D. Olivere; [chipman@chipmanbrown.com] and [olivere@chipmanbrown.com]); and (b) the Office of the United States Trustee for Region 3, J. Caleb Boggs Federal Building, 844 King Street, Lockbox 35, Wilmington, Delaware 19801 (Attn: Malcolm M. Bates [malcolm.m.bates@usdoj.gov]), so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the Application 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, Court Room 3, Wilmington, Delaware 19801.

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

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.

Dated: November 21, 2025
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Aaron J Bach

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

Mark D. Olivere (No. 4291)

Aaron J. Bach (No. 7364)

Alison R. Maser (No. 7430)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801

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Email: chipman@chipmanbrown.com

olivere@chipmanbrown.com

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maser@chipmanbrown.com

Proposed Counsel to the Debtors