

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. 96**

**CERTIFICATE OF NO OBJECTION REGARDING 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 undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or other responsive pleading to the relief requested in 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* [Docket No. 96] (the “**Application**”) filed on November 21, 2025. Pursuant to the notice of Application, objections to the Application were to be filed and served no later than December 5, 2025, at 4:00 p.m. (Eastern Time). The undersigned further certifies that a review of the Court’s docket in these cases reflects that no answer, objection, or other responsive pleading to the relief requested in the Application has been filed.

**WHEREFORE**, the undersigned, on behalf of the Debtors, respectfully requests that the Court enter the form of order attached to the Application, at the Court’s earliest convenience.

<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 (019).  
FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 1:



Dated: December 9, 2025  
Wilmington, Delaware

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ Mark D. Olivere

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

Telephone: (302) 295-0191

Email: [chipman@chipmanbrown.com](mailto:chipman@chipmanbrown.com)

[olivere@chipmanbrown.com](mailto:olivere@chipmanbrown.com)

[bach@chipmanbrown.com](mailto:bach@chipmanbrown.com)

[maser@chipmanbrown.com](mailto:maser@chipmanbrown.com)

*Proposed Counsel for Debtors and  
Debtors in Possession*