

**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 D.I. 94, 120

**CERTIFICATION OF COUNSEL REGARDING ORDER GRANTING EXTENSION
OF TIME FOR PERFORMANCE OF OBLIGATIONS UNDER GROUND LEASE
PURSUANT TO BANKRUPTCY CODE SECTION 365(d)(3)**

I, Stuart M. Brown, a partner with DLA Piper LLP (US), proposed special counsel to Hudson 1701/1706, LLC and Hudson 1702, LLC (collectively, the “Debtors”), in the above-captioned chapter 11 cases, hereby certify the following:

1. On November 20, 2025, the Debtors filed the *Debtors’ Motion for Extension of Time for Performance of Obligations Under Ground Lease Pursuant to Bankruptcy Code Section 365(d)(3)* [D.I. 94] (the “Motion”)² with the United States Bankruptcy Court for the District of Delaware (the “Court”). A proposed order was attached to the Motion as Exhibit A (the “Proposed Order”).

2. On December 4, 2025, 356W58 Ground Lessor LLC (“356W58”) filed an objection [D.I. 120] to the Motion.

3. The Debtors and 356W58 conferred and resolved their differences as reflected in a revised proposed order (the “Revised Proposed Order”).

¹ A list of 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 not otherwise defined herein will retain the meaning ascribed to such terms in the Motion.



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4. A copy of the Revised Proposed Order is attached hereto as **Exhibit A**. A redline comparing the Proposed Order and the Revised Proposed Order, to which the parties have agreed, is attached hereto as **Exhibit B**.

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

Dated: December 11, 2025
Wilmington, Delaware

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Stuart M. Brown

Stuart M. Brown (DE 4050)
1201 North Market Street, Suite 2100
Wilmington, Delaware 19801
Telephone: (302) 468-5700
Facsimile: (302) 394-2462
Email: stuart.brown@us.dlapiper.com

- and -

Neal Kronley (admitted *pro hac vice*)
David M. Riley (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 335-4500
Facsimile: (212) 335-4501
Email: neal.kronley@us.dlapiper.com
david.riley@us.dlapiper.com

Proposed Special Counsel to the Debtors

EXHIBIT A

Revised Proposed Order

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**ORDER GRANTING EXTENSION
OF TIME FOR PERFORMANCE OF OBLIGATIONS UNDER
GROUND LEASE PURSUANT TO BANKRUPTCY CODE SECTION 365(d)(3)**

Upon the motion (the “Motion”),² filed by the above-captioned debtors (together, the “Debtors”) for entry of an order (this “Order”), extending the time for the Debtors to perform their obligations under the Ground Lease for 60 days after the Petition Date; and this Court having jurisdiction over 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 February 29, 2012; and this Court having found this is a core proceeding under 28 U.S.C. § 157(b)(2)(A); and this Court having found that this Court may enter a final order consistent with article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409; and this Court having found the Debtors’ notice of the Motion and opportunity for a hearing were adequate and appropriate under the circumstances and no other or further notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested in the Motion at any hearing before this Court; and the Court having determined that the legal and factual

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² Capitalized terms not otherwise defined in this Order have the meaning given to them in the Motion.

bases set forth in the Motion and any hearing on the Motion, establish just cause for the relief granted in this Order; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors' estates, their creditors and other parties in interest; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth in this Order.
2. The Debtors' time for performance of any obligations under the Ground Lease, arising from and after the Petition Date is extended for a period of 60 days, through and including December 21, 2025.
3. By no later than December 22, 2025, Debtors shall pay all post-petition rent due under the Ground Lease to Ground Lessor. Notwithstanding the foregoing, Debtors and Ground Lessor reserve all rights with respect to any claims either party may assert against the other with respect to the Ground Lease.
4. Notice of the Motion was good and sufficient notice of the Motion and the requirements of Bankruptcy Rule 6004(a), if applicable, and the Local Rules are satisfied by such notice.
5. The Debtors are hereby authorized to take all actions necessary to effectuate the relief granted in this Order.
6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
7. This Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

EXHIBIT B

Redline

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² Capitalized terms not otherwise defined in this Order have the meaning given to them in the Motion.

of the relief requested in the Motion at any hearing before this Court; and the Court having determined that the legal and factual bases set forth in the Motion and any hearing on the Motion, establish just cause for the relief granted in this Order; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors' estates, their creditors and other parties in interest; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth in this Order.

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4. ~~3.~~ Notice of the Motion was good and sufficient notice of the Motion and the requirements of Bankruptcy Rule 6004(a), if applicable, and the Local Rules are satisfied by such notice.

5. ~~4.~~ The Debtors are hereby authorized to take all actions necessary to effectuate the relief granted in this Order.

6. ~~5.~~ The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. ~~6.~~ This Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Summary report: Litera Compare for Word 11.9.1.1 Document comparison done on 12/11/2025 2:21:20 PM	
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Intelligent Table Comparison: Active	
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Delete	4
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	11