

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)

**NOTICE OF *AMENDED*<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR HEARING  
ON DECEMBER 12, 2025, AT 10:00 A.M. (EASTERN TIME)**

THIS PROCEEDING WILL BE CONDUCTED IN PERSON. PLEASE REFER TO  
JUDGE OWENS'S CHAMBERS PROCEDURES  
([HTTPS://WWW.DEB.USCOURTS.GOV/CONTENT/JUDGE-KAREN-B-OWENS](https://www.deb.uscourts.gov/content/judge-karen-b-owens)) AND THE  
COURT'S WEBSITE ([HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-APPEARANCES](http://www.deb.uscourts.gov/ecourt-appearances)) FOR  
INFORMATION ON THE METHOD OF ALLOWED PARTICIPATION (VIDEO OR AUDIO), JUDGE  
OWENS'S EXPECTATIONS OF REMOTE PARTICIPANTS, AND THE ADVANCE REGISTRATION  
REQUIREMENTS. REGISTRATION IS REQUIRED BY 4:00 P.M. (EASTERN TIME) THE DAY BEFORE  
THE HEARING UNLESS OTHERWISE NOTICED USING THE ECOURTAPPEARANCES TOOL  
AVAILABLE ON THE COURT'S WEBSITE.

**I. ADJOURNED MATTERS**

1. Application of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Employ DLA Piper LLP (US) as Special Counsel, Effective as of the Petition Date and (II) Granting Related Relief [[Docket No. 99; Filed on November 21, 2025](#)].

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

- i. **Extended for the Official Committee of Unsecured Creditors and the Office of the United States Trustee until December 30, 2025, at 4:00 p.m. (ET).**

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

<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> Amended items in bold.



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- B. Objection by Alberto Smeke Saba and Salomon Smeke Saba to Debtors' Application to Employ DLA Piper LLP (US) as Special Counsel, Effective as of the Petition Date [[Docket No. 123; Filed December 5, 2025](#)].

Related Pleadings: None.

Status: This matter has been adjourned to the hearing on January 13, 2026 at 1:00 p.m. (ET).

## **II. RESOLVED MATTERS**

2. Debtors' Motion for Entry of an Order Extending Time for Debtors to File Schedules and Statements [[Docket No. 53; Filed on November 5, 2025](#)].

Response Deadline: November 19, 2025, at 4:00 p.m. (ET)

Responses Received: None.

Related Pleadings:

- A. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order Extending Time for Debtors to File Schedules and Statement [[Docket No. 95; Filed on November 20, 2025](#)].
- B. Order Extending Time for Debtors to File Schedules and Statements [[Docket No. 101; Entered on November 21, 2025](#)].

Status: The Court has entered an order on this matter. Accordingly, no hearing is necessary on this matter.

3. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Life Safety Critical Vendors and (II) Granting Related Relief [[Docket No. 15; Filed on October 30, 2025](#)].

Objection Deadline: November 24, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Pleadings:

- A. Order (Interim) (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Life Safety Critical Vendors and (II) Granting Related Relief [[Docket No. 50; Entered on November 3, 2025](#)].
- B. Notice of Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Life Safety Critical Vendors and (II) Granting Related Relief [[Docket No. 52; Filed November 3, 2025](#)].

- C. Certificate of No Objection Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Life Safety Critical Vendors and (II) Granting Related Relief [[Docket No. 105; Filed on November 25, 2025](#)].
- D. Order (Final) (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Life Safety Critical Vendors and (II) Granting Related Relief [[Docket No. 109; Entered on December 1, 2025](#)].

Status: The Court has entered an order on this matter. Accordingly, no hearing is necessary on this matter.

### **III. MATTERS FOR WHICH A CNO/COC HAS BEEN FILED**

- 4. 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 on November 12, 2025](#)].

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

- i. Extended for the Official Committee of Unsecured Creditors until December 9, 2025, at 4:00 p.m. (ET)

Response Received:

- A. Informal comments from the Office of the United States Trustee and the Official Committee of Unsecured Creditors.

Related Pleadings:

- A. Interim Order (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. 75; Filed on November 17, 2025](#)].
- B. Notice of Entry of Interim Order and Final Hearing Regarding Motion of the Debtors for Entry of Interim and Final Order 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. 87; Filed on November 18, 2025](#)].
- C. Certification of Counsel Regarding 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.143; Filed on December 10, 2025](#)].

- D. **Final Order (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. 153; Entered on December 10, 2025](#)].**

**Status:** The Court has entered an order on this matter. Accordingly, no hearing is necessary.

5. 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 on November 12, 2025](#)].

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

- i. Extended for the Official Committee of Unsecured Creditors until December 9, 2025, at 4:00 p.m. (ET)

Responses Received:

- A. Informal comments from the Office of the United States Trustee and the Official Committee of Unsecured Creditors.

Related Pleadings:

- A. Interim Order (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. 76; Entered November 17, 2025](#)].
- B. Notice of Interim Order and Final Hearing Regarding 5. 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. 87; Filed on November 18, 2025](#)].

- C. Certification of Counsel Regarding 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. 140; Filed on December 10, 2025](#)].
- D. **Final Order (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. 150; Entered on December 10, 2025](#)].**

**Status:** The Court has entered an order on this matter. Accordingly, no hearing is necessary.

- 6. 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; Filed November 21, 2025](#)].

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

- i. Extended for the Official Committee of Unsecured Creditors until December 9, 2025, at 4:00 p.m. (ET)

Responses Received: None.

Related Pleadings:

- A. 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 [[Docket No. 133; Filed on December 9, 2025](#)].
- B. **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. 146; Entered December 10, 2025](#)].**

**Status:** The Court has entered an order on this matter. Accordingly, no hearing is necessary.

- 7. Debtors' Motion for an Order, Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, Authorizing Debtors to Retain FTI Consulting, Inc. as Financial Advisor for the Debtors and Designating Alan Tantleff and Andrew Hinkelman as Co-Chief Restructuring Officers for the Debtors Effective as of the Petition Date, and Approving the Engagement Agreement Related Thereto [[Docket No. 97; Filed on November 21, 2024](#)].

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

- i. Extended for the Official Committee of Unsecured Creditors until December 9, 2025, at 4:00 p.m. (ET)

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

Related Pleadings:

- A. Certification of Counsel Regarding Debtors' Motion for an Order, Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, Authorizing Debtors to Retain FTI Consulting, Inc. as Financial Advisor for the Debtors and Designating Alan Tantleff and Andrew Hinkelman as Co-Chief Restructuring Officers for the Debtors Effective as of the Petition Date, and Approving the Engagement Agreement Related Thereto [[Docket No. 137; Filed on December 9, 2025](#)].
- B. **Order Authorizing Debtors to Retain FTI Consulting, Inc. as Financial Advisor for the Debtors and Designating Alan Tantleff and Andrew Hinkelman as Co-Chief Restructuring Officers for the Debtors Effective as of the Petition Date, and Approving the Engagement Agreement Related Thereto [[Docket No. 149; Entered on December 10, 2025](#)].**

**Status: The Court has entered an order on this matter. Accordingly, no hearing is necessary.**

8. Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC d/b/a Verita Global as Administrative Advisor Effective as of the Petition Date [[Docket No. 98; Filed on November 21, 2025](#)].

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

- i. Extended for the Official Committee of Unsecured Creditors until December 9, 2025, at 4:00 p.m. (ET)

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

Related Pleadings:

- A. Certification of Counsel Regarding Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC d/b/a Vertia Global as Administrative Advisor Effective as of the Petition Date [[Docket No. 134; Filed on December 9, 2025](#)].

- B. **Order Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants, LLC d/b/a Vertia Global as Administrative Advisor Effective as of the Petition Date [[Docket No. 147; Entered December 10, 2025](#)].**

**Status:** The Court has entered an order on this matter. Accordingly, no hearing is necessary.

9. Motion of the Debtors for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [[Docket No. 100; Filed on November 21, 2025](#)].

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

- i. Extended for the Official Committee of Unsecured Creditors until December 9, 2025, at 4:00 p.m. (ET)

**Responses Received:**

- A. Informal comments from the Official Committee of Unsecured Creditors.

**Related Pleadings:**

- A. Certification of Counsel Regarding Motion of the Debtors for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [[Docket No. 142; Filed on December 10, 2025](#)].
- B. **Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 152; Entered on December 10, 2025].**

**Status:** The Court has entered an order on this matter. Accordingly, no hearing is necessary.

10. Motion of the Debtors for Entry of Order (I) Authorizing the Debtors to Pay Certain Prepetition Property Taxes and (II) Granting Related Relief [[Docket No. 102; Filed on November 21, 2025](#)].

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

- i. Extended for the Official Committee of Unsecured Creditors until December 9, 2025, at 4:00 p.m. (ET).

**Responses Received:** None.

Related Pleadings:

- A. Certificate of No Objection Regarding Motion of the Debtors for Entry of Order (I) Authorizing the Debtors to Pay Certain Prepetition Property Taxes and (II) Granting Related Relief [[Docket No. 136; Filed on December 9, 2025](#)].
- B. **Order (I) Authorizing the Debtors to Pay Certain Prepetition Property Taxes and (II) Granting Related Relief** [[Docket No. 148; Entered on December 10, 2025](#)].

**Status:** The Court has entered an order on this matter. Accordingly, no hearing is necessary.

- 11. Motion of Debtors for Entry of an Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals [[Docket No. 106; Filed on November 26, 2025](#)].

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

- i. Extended for the Official Committee of Unsecured Creditors until December 9, 2025, at 4:00 p.m. (ET).

Responses Received:

- A. Informal comments from the Office of the United States Trustee and the Official Committee of Unsecured Creditors.

Related Pleadings:

- A. Certification of Counsel Regarding Motion of Debtors for Entry of an Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals [[Docket No. 141; Filed on December 10, 2025](#)].
- B. **Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals** [[Docket No. 151; Entered on December 10, 2025](#)].

**Status:** The Court has entered an order on this matter. Accordingly, no hearing is necessary.

**IV. MATTERS GOING FORWARD**

- 12. Motion of the Debtors for Entry of Interim and Final Order (I) Authorizing the 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](#)].

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



- i. Extended for Western Alliance Bank until December 10, 2025, at 11:30 a.m. (ET).
- ii. Extended for the Official Committee of Unsecured Creditors until December 10, 2025, at 11:00 a.m. (ET).
- iii. Extended for MSP Capital Investments, LLC until December 10, 2025, at 11:00 a.m. (ET).

Responses Received:

- A. Limited Objection of Alberto Smeke Saba and Salomon Smeke Saba to Debtors' Proposed Final DIP Financing Order [[Docket No. 122; Filed December 5, 2025](#)].
- B. 356W58 Ground Lessor LLC's Objection and Reservation of Rights to the Motion of the Debtors for Entry of Interim and Final Order (I) Authorizing the 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. 139; Filed December 9, 2025](#)].
- C. Objection of the Official Committee of Unsecured Creditors to the Debtors' DIP Financing Motion [[Docket No. 144; Filed December 10, 2025](#)].

Related Pleadings:

- A. Interim Order (I) Authorizing the 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. 82; Entered November 17, 2025](#)].
- B. Notice of Entry of Interim Order and Final Hearing Regarding Motion of the Debtors for Entry of Interim and Final Order (I) Authorizing the 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. 87; Filed on November 18, 2025](#)].
- C. **Amended and Restated Declaration of Alan Tantleff in Support of Debtors' Chapter 11 Petitions and First Day Motions** [[Docket No. 60, Filed on November 12, 2025](#)].
- D. **Certificate of Service re: First Day Motions Served November 12-13, 2025** [[Docket No. 66, Filed on November 14, 2025](#)].
- E. **Certificate of Service re: Documents served on or before November 18, 2025** [[Docket No. 88, Filed on November 19, 2025](#)].

- F. **Notice of Filing of Proposed Final Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral; (II) Granting Adequate Protection to Prepetition Lender; (III) Modifying the Automatic Stay; and (IV) Granting Related Relief [[Docket No. 156, Filed on December 11, 2025](#)].**

Status: This matter is going forward.

13. Debtors' Motion for Extension of Time for Performance of Obligations Under Ground Lease Pursuant to Bankruptcy Code Section 365(d)(3) [[Docket No. 94; Filed on November 20, 2025](#)].

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

- i. Extended for the Official Committee of Unsecured Creditors until December 9, 2025, at 4:00 p.m. (ET)

Responses Received:

- A. 356W58 Ground Lessor LLC's Limited Objection to Debtors' Motion for Extension of Time for Performance of Obligations Under Ground Lease Pursuant to Bankruptcy Code Section 365(d)(3) [[Docket No. 120; Filed on December 4, 2025](#)].

Related Pleadings:

- A. **Certification of Counsel Regarding Order Granting Extension of Time for Performance of Obligations under Ground Lease Pursuant to Bankruptcy Code Section 365(d)(3) [[Docket No. 157; Filed on December 11, 2025](#)].**

Status: A revised form of order has been filed under certification of counsel. No hearing is necessary.

V. **STATUS CONFERENCE**

14. Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors to Conduct Rule 2004 Examinations [[Docket No. 18; Filed on October 30, 2025](#)].

Response Deadline: November 3, 2025, at 9:00 a.m. (ET).

Responses Received:

- A. Objection by Alberto Smeke Saba and Salomon Smeke Saba to Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors to Conduct Rule 2004 Examinations [[Docket No. 37; Filed November 2, 2025](#)].

Related Pleadings:

- A. Debtors' Motion for an Order Shortening Notice and Objection Periods in Connection with the Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors to Conduct Rule 2004 Examinations [[Docket No. 20; Filed on October 30, 2025](#)].
- B. Order Shortening Notice and Objection Periods in Connection With the Emergency Motion of the Debtor for Entry of an Order Authorizing the Debtor to Conduct Rule 2004 Examinations [[Docket No. 23; Entered on October 31, 2025](#)].
- C. Notice of Hearing on Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors to Conduct Rule 2004 Examinations [[Docket No. 27; Filed October 31, 2025](#)].

**Status: This matter has been adjourned to the hearing on January 13, 2026 at 1:00 p.m. (ET).**

Dated: December 11, 2025  
Wilmington, Delaware

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ Mark D. Olivere

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