

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)

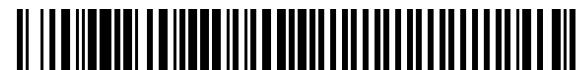
Hearing Date: January 13, 2026, at 1:00 p.m. (ET)

Obj. Deadline: January 6, 2026, at 4:00 p.m. (ET)

APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
OF HUDSON 1701/1706, LLC, *ET AL.*, FOR ENTRY OF AN ORDER AUTHORIZING  
THE RETENTION AND EMPLOYMENT OF SEWARD & KISSEL LLP  
AS COUNSEL EFFECTIVE AS OF DECEMBER 4, 2025

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby files this application (this “Application”), for entry of an order, substantially in the form attached hereto as **Exhibit A**, authorizing the retention and employment of Seward & Kissel LLP (“S&K”) as its counsel, pursuant to sections 328(a) and 1103(a) of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2014-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”). In support of this Application, the Committee also files the (i) *Declaration of Robert J. Gayda of Seward & Kissel LLP in Support of Application of the Official Committee of Unsecured Creditors of Hudson 1701/1706, LLC, et al., for Entry of an Order Authorizing the Retention and Employment of Seward & Kissel LLP as Counsel Effective as of December 4, 2025* (the “Gayda Declaration”), attached hereto as **Exhibit B**, and

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors’ 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.



(ii) *Declaration of Nicole Vaknin, on behalf of The Abadi Group, Chair of the Committee, in Support of Application of the Official Committee of Unsecured Creditors of Hudson 1701/1706, LLC, et al., for Entry of an Order Authorizing the Retention and Employment of Seward & Kissel LLP as Counsel Effective as of December 4, 2025* (the “Vaknin Declaration”), attached hereto as **Exhibit C**. In further support of the Application, the Committee respectfully states as follows:

### **JURISDICTION AND VENUE**

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction to consider this matter and grant the relief requested herein pursuant to 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. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rules 2014-1 and 2016-1.<sup>2</sup>

### **BACKGROUND**

3. On October 22, 2025 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code with this Court (the “Chapter 11 Cases”). The Debtors continue to operate their businesses as debtors-in-possession under sections 1107 and 1108 of the Bankruptcy Code.

4. No trustee or examiner has been appointed in the Chapter 11 Cases.

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<sup>2</sup> Pursuant to Local Rule 9013-1(f), the Committee consents to the entry of a final order by this Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

5. On November 25, 2025, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Committee pursuant to section 1102 of the Bankruptcy Code. *See Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 104]. The Committee consists of three (3) members: (1) 356W58 Ground Lessor LLC, (2) The Abadi Group, and (3) AJP Contracting Corp.

6. On December 4 and 5, 2025, respectively, the Committee selected S&K as its proposed lead counsel and Morris James LLP (“Morris James”) as its proposed Delaware co-counsel. On December 8, 2025, the Committee selected Province, LLC (“Province”) as its proposed financial advisor.

#### **RELIEF REQUESTED**

7. Subject to this Court’s approval, by this Application, the Committee seeks to employ S&K as its counsel in connection with these Chapter 11 Cases, effective as of December 4, 2025. Pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, the Committee respectfully requests entry of the proposed order attached hereto as **Exhibit A**, authorizing the Committee to employ and retain S&K as its counsel during these Chapter 11 Cases.

#### **RETENTION OF S&K**

8. The Committee anticipates that S&K will, in connection with these Chapter 11 Cases and subject to orders of this Court, provide a range of services to the Committee, including, but not limited to, the following:

- (a) advising the Committee in connection with its powers and duties under the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules;
- (b) assisting and advising the Committee in its consultation with the Debtors relative to the administration of these Chapter 11 Cases;

- (c) attending meetings and negotiating with the representatives of the Debtors and other parties in interest;
- (d) assisting and advising the Committee in its examination and analysis of the conduct of the Debtors' affairs;
- (e) assisting and advising the Committee in connection with any sale of the Debtors' assets pursuant to Section 363 of the Bankruptcy Code;
- (f) assisting the Committee in the review, analysis, and negotiation of any Chapter 11 plan(s) of reorganization or liquidation that may be filed and assisting the Committee in the review, analysis, and negotiation of the disclosure statement accompanying any such plan(s);
- (g) taking all necessary action to protect and preserve the interests of the Committee, including: (i) possible prosecution of actions on its behalf; (ii) if appropriate, negotiations concerning all litigation in which the Debtors are involved; and (iii) if appropriate, review and analysis of claims filed against the Debtors' estates;
- (h) generally preparing on behalf of the Committee all necessary motions, applications, answers, orders, reports, replies, responses, and papers in support of positions taken by the Committee;
- (i) appearing, as appropriate, before this Court, the appellate courts, and the U.S. Trustee, and protecting the interests of the Committee before those courts and before the U.S. Trustee; and
- (j) performing all other necessary legal services in these Chapter 11 Cases as may be directed by the Committee.

9. S&K intends to work closely with the Debtors' representatives and the other professionals retained by the Committee to ensure that there is no unnecessary duplication of services performed or charged to the Debtors' estates.

10. To the extent that S&K is assigned by the Committee to perform new services as requested by the Committee that may be necessary and proper in the Chapter 11 Cases that are materially different from the above-described services (or as otherwise described in the Application), S&K will file a supplemental declaration in accordance with Bankruptcy Rule 2014.

11. The Committee is familiar with the professional standing and reputation of S&K. The Committee has selected S&K because of its experience and reputation handling complex

bankruptcy matters, including the representation of official committees of unsecured creditors and debtors, as well as litigation matters, business reorganizations, restructurings, and liquidations under chapter 11 of the Bankruptcy Code, and its expertise, experience and knowledge in practicing before this Court. Further, the Committee believes that S&K is especially well-suited to serve as the Committee's counsel due to its attorneys' experience representing creditors' committees in other chapter 11 cases, including such cases as *iM3NY LLC*, *Ultra Safe Nuclear Corporation*, *iSun, Inc.*, *Cash Cloud, Inc.*, *A.B.C. Home & Carpet, Inc.*, *Furniture Factory Ultimate Holding, L.P.*, *PQ New York Inc.*, *SFP Franchise Corporation*, *Suniva, Inc.*, *Gracious Home LLC*, *TMT USA Shipmanagement LLC*, *North Texas Bancshares, Inc.*, and *Tribune Media Company*.

12. The Committee believes that S&K is well qualified to represent the Committee in these proceedings in an efficient and timely manner. Thus, the Committee asserts that the employment of S&K to provide the services described above, and other such services as may be necessary for the Committee to satisfy its obligations to the Debtors' unsecured creditor constituency, is appropriate and in the best interests of the Debtors' estates and their creditors.

### **PROFESSIONAL COMPENSATION**

13. The Committee understands that S&K will seek compensation for professional services rendered and reimbursement of actual and necessary expenses incurred in connection with services performed for the Committee in the Chapter 11 Cases in accordance with sections 330 and 331 of the Bankruptcy Code, the applicable provisions of the Bankruptcy Rules, the Local Rules, the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 152] (the "Compensation Procedures Order"), and any other administrative compensation orders entered in these Chapter 11 Cases.

14. The proposed rates of compensation, subject to final Court approval, are the customary hourly rates, discounted by twelve percent (12%), in effect when services are performed by the attorneys, legal assistants, and staff who provide services to the Committee. These hourly rates are subject to periodic adjustment and the Committee has been advised of that fact.<sup>3</sup>

15. The current standard hourly rates of the S&K professionals are set forth in the chart below:

Billing Category	US Range
Partners	\$1,400 - \$2,500
Counsel	\$1,225 - \$1,500
Associates	\$675 - \$1,225
Paraprofessionals	\$300 - \$610

16. The hourly rates of the S&K professionals anticipated to be primarily staffed on this matter are set forth below:

Robert J. Gayda:	\$1,700.00
Thomas R. Hooper:	\$1,225.00
Catherine V. LoTempio:	\$1,225.00
Andrew J. Matott:	\$1,175.00
Kwame Akuffo:	\$1,075.00
Shivani D. Patel:	\$675.00

17. Consistent with the firm's policy with respect to its other clients, S&K will charge the Committee for all charges and disbursements incurred in rendering services to the Committee. These customary items include, among other things, travel, business meals, computerized research, postage, witness fees, and other fees related to trials and hearings. Internal costs or overhead costs

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<sup>3</sup> Hourly rates are subject to periodic firm-wide adjustments in the ordinary course of S&K's business. Notice of adjustments will be provided to the Committee, the Debtors, and the U.S. Trustee, and S&K will file such notice with the Court.

and document production services (including regular secretarial and word processing time) will not be charged separately.

18. No promises were received by S&K, including any partner, counsel, or associate of S&K, as to compensation in connection with these Chapter 11 Cases, other than in accordance with the provisions of the Bankruptcy Code. Neither S&K, nor any partner, counsel, or associate of S&K, has any agreement with any other entity to share with such entity any compensation received by S&K in connection with these Chapter 11 Cases.

**DISINTERESTEDNESS OF S&K AND NO ADVERSE INTEREST**

19. Based upon the Gayda Declaration filed herewith, the Committee is satisfied that (a) S&K is a “disinterested person” within the meaning of section 101(14) of the Bankruptcy Code, as required by section 328 of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtors, their estates, their creditors, or the Committee and the members thereof; (b) S&K does not represent any entity having an adverse interest in connection with the Chapter 11 Cases, as required by section 1103 of the Bankruptcy Code; and (c) to best of the Committee’s knowledge, S&K has no connection to the Debtors, their estates, their creditors, the Committee and the members thereof, or other parties in interest except as disclosed in the Gayda Declaration.

**STATEMENT REGARDING U.S. TRUSTEE GUIDELINES**

20. S&K shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with these Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, Local Rules, the Compensation Procedures Order, and any other applicable procedures and orders of the Court.

21. S&K also intends to 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 11, 2013* (the "UST Guidelines") in connection with this Application and any interim and final fee applications to be filed by S&K in these Chapter 11 Cases.

22. The following is provided in response to the request for additional information set forth in 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:** As an accommodation to the Committee, S&K agreed to a twelve percent (12%) discount to its 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 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and the reasons for the difference.

**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 Chapter 11 Cases has been approved by the Committee. In accordance with the UST Guidelines, the budget may be amended or supplemented, as necessary, to reflect changed or unanticipated developments.

### **RETROACTIVE RETENTION**

23. The Committee requests approval of the employment of S&K as its counsel effective as of December 4, 2025. Such relief is warranted by the circumstances presented by these Chapter 11 Cases. Upon its selection as counsel, S&K was required to immediately commence work on time-sensitive matters and promptly devote substantial resources to the Chapter 11 Cases pending submission and approval of this Application. The Third Circuit has identified “time pressure to begin service” and absence of prejudice as factors favoring retroactive retention. *See In re Arkansas Co.*, 798 F.2d 645, 650 (3d Cir. 1986); *see also In re Indian River Homes, Inc.*, 108 B.R. 46, 52 (D. Del. 1989). S&K has provided, and will continue to provide, valuable services to the Committee.

### **NOTICE**

24. Notice of this Application will be provided to the following: (a) the U.S. Trustee; (b) counsel to the Debtors; (c) the Debtors’ top twenty (20) unsecured creditors; (d) counsel to Parkview Financial REIT, LP; and (e) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Committee respectfully submits that, in light of the nature of the relief requested, no other or further notice is required.

### **NO PRIOR REQUEST**

25. No previous application for the relief sought herein has been made to this or any other Court.

**CONCLUSION**

**WHEREFORE**, the Committee respectfully requests that the Court (a) enter an order, substantially in the form attached hereto as **Exhibit A**, authorizing the Committee to retain and employ S&K as counsel to the Committee in connection with the Chapter 11 Cases, effective as of December 4, 2025, and (b) grant the Committee such other and further relief as the Court deems just and proper.

Dated: December 23, 2025

Respectfully submitted,

The Official Committee of Unsecured Creditors of  
Hudson 1701/1706, LLC, *et al.*,

By: /s/ Nicole Vaknin  
Nicole Vaknin, on behalf of The Abadi Group,  
solely in its capacity as Chair of the Official  
Committee of Unsecured Creditors of Hudson  
1701/1706, LLC, *et al.*

**EXHIBIT A**

**Proposed Order**

**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)

Ref. Docket No. \_\_

**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF  
SEWARD & KISSEL LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF HUDSON 1701/1706, LLC, *ET AL.*,  
EFFECTIVE AS OF DECEMBER 4, 2025**

Upon the application (the “Application”)<sup>2</sup> of the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned Chapter 11 cases (the “Chapter 11 Cases”) for entry of an order authorizing the Committee to employ and retain Seward & Kissel LLP (“S&K”) as its counsel, effective as of December 4, 2025, pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the “Bankruptcy Code”); and upon the (i) *Declaration of Robert J. Gayda of Seward & Kissel LLP in Support of Application of the Official Committee of Unsecured Creditors of Hudson 1701/1706, LLC, et al., for Entry of an Order Authorizing the Retention and Employment of Seward & Kissel LLP as Counsel Effective as of December 4, 2025* (the “Gayda Declaration”), attached to the Application as **Exhibit B**, and (ii) *Declaration of Nicole Vaknin, on behalf of The Abadi Group, Chair of the Committee, in Support of Application of the Official Committee of Unsecured Creditors of Hudson 1701/1706, LLC, et al., for Entry of an Order Authorizing the Retention and Employment of Seward & Kissel LLP as Counsel Effective*

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors’ 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 not defined herein shall have the meanings given to them in the Application.

as of December 4, 2025 (the “Vaknin Declaration,” together with the Gayda Declaration, the “Declarations”), attached to the Application as **Exhibit C**; and this Court having jurisdiction pursuant to sections 157 and 1334 of title 28 of the United States Code to consider the Application and the relief requested therein; and venue being proper in this Court pursuant to sections 1408 and 1409 of title 28 of the United States Code; and this Court being satisfied that notice of the Application and the opportunity for a hearing on the Application was appropriate under the particular circumstances and no further or other notice need be given; and this Court being satisfied, based on the representations made in the Application and the Gayda Declaration, that S&K (a) does not represent or hold any interest adverse to the Committee in connection with these Chapter 11 Cases, (b) is a “disinterested person” as such term is defined in section 101(14) of the Bankruptcy Code, and (c) does not represent any entity having an adverse interest in connection with the Chapter 11 Cases as required by section 1103 of the Bankruptcy Code; and this Court having determined that the legal and factual bases set forth in the Application and the Declarations establish good cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Application is hereby granted and approved as set forth herein effective as of December 4, 2025.

2. In accordance with section 1103(a) of the Bankruptcy Code and, with respect to S&K’s hourly rates, section 328(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, the Committee is authorized to employ and to retain S&K as its counsel in these Chapter 11 Cases, on the terms and conditions set forth in the Application and the Gayda Declaration.

3. S&K shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with these Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Local Rules, any case-specific fee protocols approved by this Court after notice, and a hearing pursuant to any other applicable procedures and orders of this Court. S&K 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*, in connection with both the Application and any interim and final fee application(s) to be filed by S&K in these Chapter 11 Cases.

4. Notwithstanding anything to the contrary in the Application, S&K shall not seek reimbursement of any fees or costs from the estate arising from the defense of any of S&K's monthly fee statements or fee applications in these Chapter 11 Cases.

5. S&K shall provide ten business days' notice to the Debtors, the U.S. Trustee, and the Committee in connection with any increase of the hourly rates listed in the Application. The U.S. Trustee and the Debtors retain all rights to object to any rate increase on all grounds, including, but not limited to, the reasonableness standard provided in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

6. To the extent of any inconsistency among the Application or the Declarations, the terms of this Order shall govern.

7. The Committee and S&K are authorized to take all actions they deem necessary and appropriate to effectuate the relief granted pursuant to this Order in accordance with the

Application, including, without limitation, executing any additional or supplemental documents incidental to the relief granted herein.

8. Notice of the Application as provided therein is deemed to be good and sufficient notice of such Application.

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

10. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

**EXHIBIT B**

**Gayda Declaration**



**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)

**DECLARATION OF ROBERT J. GAYDA OF SEWARD & KISSEL LLP IN SUPPORT  
OF THE APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF HUDSON 1701/1706, LLC, *ET AL.*, FOR ENTRY OF AN ORDER  
AUTHORIZING THE RETENTION AND EMPLOYMENT OF SEWARD & KISSEL  
LLP AS COUNSEL EFFECTIVE AS OF DECEMBER 4, 2025**

I, Robert J. Gayda, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of the firm of Seward & Kissel LLP ("S&K"),<sup>2</sup> which maintains an office for the practice of law at One Battery Park Plaza, New York, NY 10004. I am an attorney-at-law, duly admitted and in good standing to practice in the State of New York and the United States District Court for the Southern District of New York.

2. I submit this declaration pursuant to section 1103 of title 11 of the United States Code (the "Bankruptcy Code"), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rules 2014-1 and 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules") in support of the accompanying application (the "Application") of the Official Committee of Unsecured Creditors (the "Committee") of Hudson 1701/1706, LLC, *et al.*, (the "Debtors") to employ and retain S&K as its counsel, effective as of December 4, 2025.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' 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> Each capitalized term that is not defined herein shall have the meaning set forth in the Application.

3. Except as otherwise stated herein, the facts set forth in this declaration are based upon my personal knowledge and/or information provided to me by other S&K attorneys or employees acting under my general supervision or direction. To the extent that any information disclosed herein requires amendment or modification upon S&K's completion of further analysis or as additional information becomes available to S&K, a supplemental declaration will be submitted to the Court. Subject to the approval of this Court and in compliance with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, and the Local Rules, S&K intends to apply for compensation for professional services rendered in connection with these Chapter 11 Cases, plus reimbursement of actual, necessary expenses and other charges incurred by S&K during the Chapter 11 Cases.

#### **SERVICES TO BE PROVIDED**

4. S&K is well qualified to serve as the Committee's counsel in the Chapter 11 Cases. S&K has substantial experience and reputation handling complex bankruptcy matters, including the representation of official committees of unsecured creditors and debtors, as well as litigation matters, business reorganizations, restructurings, and liquidations under chapter 11 of the Bankruptcy Code, and expertise, experience and knowledge in practicing before this Court. Further, S&K is especially well-suited to serve as the Committee's counsel due to its attorneys' experience representing creditors' committees in other chapter 11 cases, including such cases as *iM3NY LLC*, *Ultra Safe Nuclear Corporation*, *iSun, Inc.*, *Cash Cloud, Inc.*, *A.B.C. Home & Carpet, Inc.*, *Furniture Factory Ultimate Holding, L.P.*, *PQ New York Inc.*, *SFP Franchise Corporation*, *Suniva, Inc.*, *Gracious Home LLC*, *TMT USA Shipmanagement LLC*, *North Texas Bancshares, Inc.*, and *Tribune Media Company*. Additionally, S&K has extensive expertise in other areas of law, including corporate, finance, litigation, tax, and real estate, that will enable

S&K to fully represent the interests of the Committee in the Chapter 11 Cases in an efficient and effective manner.

5. In connection with these Chapter 11 Cases and subject to orders of this Court, the Committee has requested court authorization to retain S&K as counsel for the Committee,<sup>3</sup> to provide a range of services to the Committee, including, but not limited to, the following:

- (a) advising the Committee in connection with its powers and duties under the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules;
- (b) assisting and advising the Committee in its consultation with the Debtors relative to the administration of these Chapter 11 Cases;
- (c) attending meetings and negotiating with the representatives of the Debtors and other parties in interest;
- (d) assisting and advising the Committee in its examination and analysis of the conduct of the Debtors' affairs;
- (e) assisting and advising the Committee in connection with any sale of the Debtors' assets pursuant to Section 363 of the Bankruptcy Code;
- (f) assisting the Committee in the review, analysis, and negotiation of any Chapter 11 plan(s) of reorganization or liquidation that may be filed and assisting the Committee in the review, analysis, and negotiation of the disclosure statement accompanying any such plan(s);
- (g) taking all necessary action to protect and preserve the interests of the Committee, including: (i) possible prosecution of actions on its behalf; (ii) if appropriate, negotiations concerning all litigation in which the Debtors are involved; and (iii) if appropriate, review and analysis of claims filed against the Debtors' estates;
- (h) generally preparing on behalf of the Committee all necessary motions, applications, answers, orders, reports, replies, responses, and papers in support of positions taken by the Committee;

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<sup>3</sup> By separate application the Committee has filed an application to retain Morris James as Delaware counsel to the Committee. S&K will coordinate the division of responsibilities with Morris James throughout the engagement to ensure that there is no duplication of services rendered on the Committee's behalf.

- (i) appearing, as appropriate, before this Court, the appellate courts, and the U.S. Trustee, and protecting the interests of the Committee before those courts and before the U.S. Trustee; and
- (j) performing all other necessary legal services in these Chapter 11 Cases as may be directed by the Committee.

### **PROFESSIONAL COMPENSATION**

6. S&K will seek compensation for professional services rendered and reimbursement of actual and necessary expenses incurred in connection with services performed for the Committee in the Chapter 11 Cases in accordance with sections 330 and 331 of the Bankruptcy Code, the applicable provisions of the Bankruptcy Rules, the Local Rules, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 152] (the “Compensation Procedures Order”), and any other administrative compensation orders entered in these Chapter 11 Cases.

7. The proposed rates of compensation, subject to final Court approval, are the customary hourly rates, discounted by twelve percent (12%),<sup>4</sup> in effect when services are performed by the attorneys, legal assistants, and staff who provide services to the Committee. These hourly rates are subject to periodic adjustment and the Committee has been advised of that fact.<sup>5</sup>

8. The current standard hourly rates of the S&K professionals are set forth in the chart below:

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<sup>4</sup> As an accommodation to the Committee, S&K agreed to a twelve percent (12%) discount to its standard hourly rates.

<sup>5</sup> Hourly rates are subject to periodic firm-wide adjustments in the ordinary course of S&K’s business. Notice of adjustments will be provided to the Committee, the Debtors, and the U.S. Trustee, and S&K will file such notice with the Court.

Billing Category	US Range
Partners	\$1,400 - \$2,500
Counsel	\$1,225 - \$1,500
Associates	\$675 - \$1,225
Paraprofessionals	\$300 - \$610

9. The hourly rates of the S&K professionals anticipated to be primarily staffed on this matter are set forth below:

Robert J. Gayda:	\$1,700.00
Thomas R. Hooper:	\$1,225.00
Catherine V. LoTempio:	\$1,225.00
Andrew J. Matott:	\$1,175.00
Kwame Akuffo:	\$1,075.00
Shivani D. Patel:	\$675.00

10. The hourly rates set forth above are S&K's standard hourly rates for work of this nature. These rates are set at a level designed to compensate S&K fairly for the work of their attorneys and paralegals and to cover fixed and routine overhead expenses. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Other attorneys and paralegals within S&K may from time to time serve the Committee in connection with the matters described herein. S&K has not received a retainer in connection with its representation of the Committee in these Chapter 11 Cases.

11. It is S&K's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the clients' cases. The expenses charged to clients include, among other things, regular mail and express mail charges, special or hand delivery charges, document processing, travel expenses, expenses for "working meals," computerized research, transcription costs as well as non-ordinary overhead expenses such as paraprofessional overtime. S&K will charge the Committee for these expenses in a manner and at rates consistent with charges made

generally to S&K's other clients or as previously fixed by this Court. S&K believes that it is fairer to charge these expenses to the clients incurring them than to increase the hourly rates and spread these expenses among all clients.

**DISINTERESTEDNESS AND DISCLOSURE OF CONNECTIONS**

12. Neither I, S&K, nor any partner, counsel, associate, or other attorney at S&K, insofar as I have been able to ascertain, has in the past represented the Debtors' largest creditors, any significant beneficiaries of the Debtors (holding 5% or more of the beneficial interest in the Debtors), or any Potential Party in Interest (as defined below), except as hereinafter set forth.

13. In preparing this declaration, we have used a set of procedures established by S&K to ensure compliance with the requirements of the Bankruptcy Code and the Bankruptcy Rules regarding retention of professionals by an official committee under the Bankruptcy Code. In that regard, S&K obtained a list of names and entities who may be parties in interest in these Chapter 11 Cases from the Debtors, including *inter alia*, the Debtors, non-debtor affiliates, the Debtors' largest unsecured creditors, the Debtors' secured lenders, the Debtors' taxing authorities, insurance and utility providers of the Debtors, the Debtors' landlords and related parties, and other significant parties in interest (the "Potential Parties in Interest"). A list of the Potential Parties in Interest is attached hereto as **Schedule 1**.

14. S&K maintains and systematically updates its conflict check system in the regular course of its business, and it is the regular practice of S&K to make and maintain these records. The conflict system maintained by S&K is designed to include (i) every matter on which it is now or has been engaged, (ii) the entity by which it is now or has been engaged, (iii) the identity of related parties, (iv) the identity of adverse parties, and (v) the attorney at S&K that is knowledgeable about the matter. It is the policy of S&K that no new matter may be accepted or

opened within the firm without completing and submitting to those charged with maintaining the conflict check system the information necessary to check each such matter for conflicts, including the identity of the prospective client, the matter and the related and adverse parties. Accordingly, the database is updated for every new matter undertaken by S&K. The scope of the system is a function of the completeness and accuracy of the information submitted to the attorney opening a new matter.

15. Insofar as we have been able to ascertain, S&K has in the past represented, currently represents and/or may in the future represent, in matters wholly unrelated to the Debtors or these Chapter 11 Cases, certain Potential Parties in Interest, including, without limitation, those entities set forth on **Schedule 2**, attached hereto, (a) who are current clients or their affiliates or (b) who have been represented by S&K within the last two years. I do not believe that any single matter is a major engagement that, alone or in the aggregate with other engagements for the same entity, involves the billing of fees in excess of one percent (1%) of S&K's fees billed over the past twelve months. Moreover, S&K will not represent any of the Potential Parties in Interest in any facet of the Chapter 11 Cases.

16. Going forward, S&K will represent no entity other than the Committee in connection with these Chapter 11 Cases. However, S&K may represent a successor in interest to the Committee pursuant to a confirmed plan in these Chapter 11 Cases.

17. Except as set forth in **Schedule 2**, I do not believe there is any connection or interest (as such terms are used in section 101(14) of the Bankruptcy Code and Bankruptcy Rule 2014(a)) between S&K and (i) any attorney employed by the Office of the United States Trustee for the District of Delaware or (ii) any counsel, accountants, financial consultants, and investment bankers who represent or may represent claimants or other parties in interest in these Chapter 11 Cases. In

addition, as part of its practice, S&K appears in cases, proceedings, and transactions involving many different attorneys, counsel, accountants, financial consultants, and investment bankers, some of which now or may in the future represent claimants and parties in interest in these Chapter 11 Cases. S&K has not and will not represent any such entities in relation to these Chapter 11 Cases nor have any relationship with any such entities that would be adverse to the Committee or its interests in the matters upon which S&K is to be employed.

18. Based upon the information available to me, neither I, S&K, nor any partner, counsel or associate thereof, insofar as I have been able to ascertain, has any connection with any United States Bankruptcy Judge or District Court Judge for the District of Delaware or to the United States Trustee for such district or any employee in the office thereof.

19. Except as set forth herein, and based upon the information available to me, neither I, S&K, nor any partner, counsel or associate thereof, insofar as I have been able to ascertain, (i) is a creditor, an equity security holder, or an insider of the Debtors, (ii) is or was, within two years before the date of the filing of the petition, a director, officer, or employee of the Debtors, or (iii) has 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. Based upon the information available to me, I believe that S&K is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code.

20. No promises were received by S&K, any partner, counsel, or associate of S&K, as to compensation in connection with these Chapter 11 Cases, other than in accordance with the provisions of the Bankruptcy Code. Neither S&K, nor any partner, counsel, or associate of S&K has any agreement with any other entity to share with such entity any compensation received by S&K in connection with these Chapter 11 Cases.



**AFFIRMATIVE STATEMENT OF DISINTERESTEDNESS**

21. Based on the conflicts search conducted to date and described herein, to the best of my knowledge and insofar as I have been able to ascertain, (a) I believe S&K is a “disinterested person” within the meaning of section 101(14) of the Bankruptcy Code, as required by section 328 of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtors, their estates, their creditors, or the Committee and the members thereof; (b) S&K does not represent any entity having an adverse interest in connection with the Chapter 11 Cases as required by section 1103 of the Bankruptcy Code; and (c) S&K has no connection to the Debtors, their estates, their creditors, the Committee, and the members thereof, or other parties in interest, except as disclosed herein.

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

Date: December 23, 2025

/s/ Robert J. Gayda  
Robert J. Gayda

## **Schedule 1**

### ***Potential Parties in Interest***

#### **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  
The Abadi Group  
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

**Schedule 2**<sup>1</sup>***Schedule of Parties-In-Interest that Seward & Kissel LLP  
Currently Represents and/or Has Formerly Represented***

<b>Interested Party</b>	<b>Relationship to Debtors</b>	<b>Description of Relationship</b>
Houston Specialty Insurance Company	Broker & Insurers	S&K represents, or has represented in the past, the interested party or an affiliated entity of the interested party in matters unrelated to the Debtors' Chapter 11 Cases.
Liberty Surplus Insurance Corporation	Broker & Insurers	S&K represents, or has represented in the past, client(s) adverse to the interested party or an affiliated entity of the interested party in matters unrelated to the Debtors' Chapter 11 Cases.
Western Alliance Bancorporation	Banks & Fin. Institution	S&K represents, or has represented in the past, the interested party or an affiliated entity of the interested party in matters unrelated to the Debtors' Chapter 11 Cases.
DLA Piper LLP	Bankruptcy Professionals	S&K represents, or has represented in the past, certain parties represented by the interested party or an affiliated entity of the interested party, in matters unrelated to the Debtors' Chapter 11 Cases.
Kurtzman Carson Consultantes, LLC dba Verita Global	Bankruptcy Professionals	S&K represents, or has represented in the past, the interested party or an affiliated entity of the interested party in matters unrelated to the Debtors' Chapter 11 Cases.
Internal Revenue Service	Taxing and Governmental Authorities	S&K represents, or has represented in the past, clients adverse to the interested party or an affiliated entity of the interested party in matters unrelated to the Debtors' Chapter 11 Cases.

<sup>1</sup> Due to the similarity of names and certain entities, S&K was not able to determine if all the entities listed herein are actually affiliates of certain clients. However, out of an abundance of caution, S&K has listed those entities which it reasonably believes to be affiliates of current clients.

**EXHIBIT C**

**Vaknin Declaration**

**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)

**DECLARATION OF NICOLE VAKNIN, ON BEHALF OF THE ABADI GROUP,  
CHAIR OF THE COMMITTEE, IN SUPPORT OF APPLICATION OF THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS OF HUDSON 1701/1706, LLC, *ET AL.*,  
FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND  
EMPLOYMENT OF SEWARD & KISSEL LLP AS COUNSEL  
EFFECTIVE AS OF DECEMBER 4, 2025**

I, Nicole Vaknin, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. My name is Nicole Vaknin, and I am a representative of The Abadi Group. I am over the age of 21 and am competent in all respects to make this Declaration. The Abadi Group is the Chair of the Official Committee of Unsecured Creditors of Hudson 1701/1706, LLC, *et al.* (the “Committee”), appointed in the jointly administered chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors in possession (the “Debtors”).

2. I make this declaration in support of the Committee’s Application<sup>2</sup> to retain Seward & Kissel LLP (“S&K”) as counsel pursuant to sections 328(a) and 1103(a) of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2014-1 of the Local Rules of the United

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors’ 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 and not otherwise defined herein have the meanings ascribed to them in the Application.

States Bankruptcy Court for the District of Delaware (the “Local Rules”). Except as otherwise noted, I have personal knowledge as to all the information set forth below.

3. I submit this declaration pursuant to ¶ D.2 of 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 “U.S. Trustee Guidelines”) promulgated by the Office of the United States Trustee. In support of the Application, the Committee relies upon the Gayda Declaration, which is attached to the Application as **Exhibit B**. I have reviewed and am familiar with the contents of the Application.

4. I am informed by S&K that the U.S. Trustee Guidelines request that any application for employment of an attorney under sections 327 or 1103 of the Bankruptcy Code be accompanied by a verified statement from the client that addresses the following:

- (a) The identity and position of the person making the verification. The person ordinarily should be the general counsel of the debtor or another officer responsible for supervising outside counsel and monitoring and controlling legal costs.
- (b) The steps taken by the client to ensure that the applicant’s billing rates and material terms for the engagement are comparable to the applicant’s billing rates and terms for other non-bankruptcy engagements and to the billing rates and terms of other comparably skilled professionals.
- (c) The number of firms the client interviewed.
- (d) If the billing rates are not comparable to the applicant’s billing rates for other non-bankruptcy engagements and to the billing rates of other comparably skilled professionals, the circumstances warranting the retention of that firm.
- (e) The procedures the client has established to supervise the applicant’s fees and expenses and to manage costs. If the procedures for the budgeting, review and approval of fees and expenses differ from those the client regularly employs in non-bankruptcy cases to supervise outside counsel, explain how and why. In addition, describe any efforts to negotiate rates, including rates for routine matters, or in the alternative to delegate such matters to less expensive counsel.



**A. Identity of Declarant**

5. On October 22, 2025 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code with this Court (the “Chapter 11 Cases”). The Debtors continue to operate their businesses as debtors-in-possession under sections 1107 and 1108 of the Bankruptcy Code.

6. On November 25, 2025, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Committee pursuant to section 1102 of the Bankruptcy Code. *See Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 104]. The Committee consists of three (3) members: (1) 356W58 Ground Lessor LLC, (2) The Abadi Group, and (3) AJP Contracting Corp.

7. As a member of the Committee, I was directly involved in the Committee’s decision to retain S&K as counsel in these Chapter 11 Cases and actively participated in negotiating the terms of S&K’s employment together with members of the Committee.

**B. Steps Taken to Ensure Comparability of Engagement Terms**

8. I have confirmed with S&K that, while its billing rates vary from attorney to attorney based on such factors as the attorney’s seniority and position with the firm (e.g., partner, associate), years of experience, and the demand for services in the attorney’s particular area of expertise, its billing rates are comparable to the rates of firms similar to S&K and do not vary as a function of whether the services performed relate to a bankruptcy engagement or a non-bankruptcy engagement. The Committee has been informed that S&K endeavors to set the hourly rates for their attorneys and paraprofessionals at levels competitive to those charged by firms with which they compete.

**C. Selection of S&K as Committee Counsel**

9. A number of law firms sought to represent the Committee as counsel. The Committee selected S&K to serve as its counsel based upon its experience and reputation handling complex bankruptcy matters, including the representation of official committees of unsecured creditors and debtors, as well as litigation matters, business reorganizations, restructurings, and liquidations under chapter 11 of the Bankruptcy Code, and its expertise, experience and knowledge in practicing before this Court. This decision was also premised upon S&K's bankruptcy and non-bankruptcy billing practices, hourly rates, and experience.

10. Prior to selecting S&K as counsel, the Committee discussed the hourly billing rates of the other firms and compared them to S&K's rates. As an accommodation to the Committee, S&K agreed to a twelve percent (12%) discount to its standard hourly rates. In addition, the Committee confirmed that (i) the S&K attorneys staffed to this engagement will not be charging a premium or in any way increasing their hourly rates over the fees charged to non-bankruptcy clients and (ii) the material terms for the engagement are comparable to terms of other comparably skilled professionals. The Committee evaluated the breadth of the firms' experience and areas of expertise, the firms' prior history of representing committees, debtors, creditors and other interested parties in chapter 11 cases and the anticipated attorney's fees to be billed in connection with these Chapter 11 Cases.

11. For these reasons, the Committee believes that S&K is well qualified and uniquely able to represent the Committee in these Chapter 11 Cases in an efficient and timely manner.

**D. Procedures Established to Supervise Fees and Expenses and Manage Costs**

12. S&K has provided the Committee with a preliminary prospective budget and staffing plan to comply with the U.S. Trustee's requests for information and additional disclosures

and any other orders of the Court, recognizing that, in the course of these Chapter 11 Cases, there may be unforeseeable fees and expenses that will need to be addressed by the Committee and S&K. I will review all staffing plans and budgets to supervise S&K's fees and expenses and to manage costs and, together with S&K, make adjustments as may be necessary or appropriate. In addition, I will review all applications for compensation submitted by S&K to ensure that S&K's fees and costs are consistent with the budget and appropriate in scope and amount, and that there has been no duplication with the Committee's other professionals.

13. 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 or verified by Committee counsel, and my personal opinion, based upon my experience, my knowledge, and the information provided to me. I am authorized to submit this Declaration on behalf of the Committee and, if called upon to testify, I would testify competently to the facts set forth herein.

14. Based on the foregoing, the Committee is of the opinion that it is necessary to employ S&K and that such employment is in the best interest of the Debtors' estates.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed On: December 23, 2025

By: /s/ Nicole Vaknin  
Nicole Vaknin, on behalf of The Abadi Group,  
solely in its capacity as Chair of the Official  
Committee of Unsecured Creditors of Hudson  
1701/1706, LLC, *et al.*

**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: January 13, 2026, at 1:00 p.m. (ET)

Obj. Deadline: January 6, 2026, at 4:00 p.m. (ET)

**NOTICE OF APPLICATION OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF HUDSON 1701/1706, LLC, *ET AL.*,  
FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND  
EMPLOYMENT OF SEWARD & KISSEL LLP AS COUNSEL  
EFFECTIVE AS OF DECEMBER 4, 2025**

**PLEASE TAKE NOTICE** that on December 23, 2025, the Official Committee of Unsecured Creditors (the “Committee”) of Hudson 1701/1706, LLC, *et al.* filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Application of the Official Committee of Unsecured Creditors of Hudson 1701/1706, LLC, et al., for Entry of an Order Authorizing the Retention and Employment of Seward & Kissel LLP as Counsel Effective as of December 4, 2025* (the “Application”).

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the Application or the relief requested therein must be filed with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **January 6, 2026 at 4:00 p.m. (ET)** (the “Objection Deadline”). At the same time, you must serve a copy of the objection so as to be received on or before the Objection Deadline upon the proposed undersigned counsel to the Committee.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE APPLICATION WILL BE HELD ON JANUARY 13, 2026 AT 1:00 P.M. (ET) BEFORE THE HONORABLE KAREN B. OWENS, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.**

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors’ 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.

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

Dated: December 23, 2025  
Wilmington, Delaware

**MORRIS JAMES LLP**

/s/ Eric J. Monzo

Eric J. Monzo (DE Bar No. 5214)  
Siena B. Cerra (DE Bar No. 7290)  
3205 Avenue North Blvd, Suite 100  
Wilmington, DE 19803  
Telephone: (302) 888-6800  
Facsimile: (302) 571-1750  
E-mail: emonzo@morrisjames.com  
scerra@morrisjames.com

-and-

**SEWARD & KISSEL LLP**

Robert J. Gayda (admitted *pro hac vice*)  
Thomas Ross Hooper (admitted *pro hac vice*)  
Catherine V. LoTempio (admitted *pro hac vice*)  
Andrew J. Matott (admitted *pro hac vice*)  
One Battery Park Plaza  
New York, New York 10004  
Telephone: (212) 574-1200  
Facsimile: (212) 450-8421  
Email: gayda@sewkis.com  
hooper@sewkis.com  
lotempio@sewkis.com  
matott@sewkis.com

*Proposed Counsel to the Official Committee of  
Unsecured Creditors*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Hudson 1701/1706, LLC, *et al.*,  
Debtors.<sup>1</sup>

Chapter 11

Case No. 25-11853 (KBO)  
(Jointly Administered)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of December, 2025, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the *Application of the Official Committee of Unsecured Creditors of Hudson 1701/1706, LLC, et al., for Entry of an Order Authorizing the Retention and Employment of Seward & Kissel LLP as Counsel Effective as of December 4, 2025* upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and additional service was completed via electronic mail or first-class mail, postage pre-paid, on the parties listed on the attached service list.

Dated: December 23, 2025

/s/ Eric J. Monzo  
Eric J. Monzo (DE Bar No. 5214)

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<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.

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Email
Counsel to 356W58 Ground Lessor LLC	Adler & Stachenfeld LLP	Kirk L Brett and Patrick O'Connor	555 Madison Avenue, 6th floor			New York	NY	10022	kbrett@adstach.com; poconnor@adstach.com
Mechanic's Lienholder	Alba Services Inc		240 W 52nd St			New York	NY	10019	
Mechanic's Lienholder	Alternate Energy Solutions LLC	Jonathan Squille	32 S Jefferson Rd			Whippany	NJ	07981	
Mechanic's Lienholder	Alternate Energy Solutions LLC		163 Madison Ave Ste 320	Donnelly Minter & Kelly LLC		Morristown	NJ	07960	
Proposed Counsel to the Debtors	Chipman Brown Cicero & Cole, LLP	William E. Chipman, Jr.	1313 North Market Street, Suite 5400	Hercules Plaza		Wilmington	DE	19801	chipman@chipmanbrown.com
Mechanic's Lienholder	CMBM		15036 Melbourne Ave Fl 1			Flushing	NY	11367	
Delaware State AG and DOJ	Delaware Dept of Justice	Attorney General	Attn Bankruptcy Department	Carvel State Building	820 N French St	Wilmington	DE	19801	attorney.general@state.de.us;
DE Secretary of State	Delaware Secretary of State	Division of Corporations	Franchise Tax	PO Box 898		Dover	DE	19903	attorney.general@delaware.gov
DE State Treasury	Delaware State Treasury		820 Silver Lake Blvd., Suite 100			Dover	DE	19904	dosdoc_bankruptcy@state.de.us
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Mechanic's Lienholder	Elysium Construction Inc	Alan Kenny	315 W 39th St Ste 705			New York	NY	10018	david.riley@us.dlapiper.com
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Counsel to Parkview Financial REIT, LP, Counsel to the DIP Lender and Prepetition Lender; PV Hudson LLC	Hogan Lovells US LLP	Richard Wynne, David P Simonds, Edward McNeilly and Christopher R. Bryant	1999 Avenue of the Stars, Suite 1400			Los Angeles	CA	90067	richard.wynne@hoganlovells.com;
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IRS	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346			Philadelphia	PA	19101-7346	chris.bryant@hoganlovells.com
IRS	Internal Revenue Service	Centralized Insolvency Operation	2970 Market St			Philadelphia	PA	19104	
Mechanic's Lienholder	J & N Dolcini Inc	Mark Nash	43-34 32nd Pl			Long Island City	NY	11101	
Claims and Noticing Agent	KCC dba Verita		222 N. Pacific Coast Highway, Suite 300			El Segundo	CA	90245	hudsoninfo@veritaglobal.com
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New York Attorney General	New York Attorney General	Attn Bankruptcy Department	Office of the Attorney General	The Capitol, 2nd Fl.		Albany	NY	12224-0341	dash@adstach.com; mstevens@adstach.com
New York City Department of Housing Preservation and Development	New York City Department of Housing Preservation and Development		100 Gold Street			New York	NY	10038	letitia.james@ag.ny.gov
Litigation Plaintiffs	New York Hotel and Gaming Trades Council	c/o Annalise Leonelli	120 Broadway 28th Fl	Pitta LLP		New York	NY	10271	ServeHPD@hpd.nyc.gov
New York Secretary of State	New York Secretary of State	Attn Corporate Bankruptcy Dept	One Commerce Plaza	99 Washington Ave		Albany	NY	12231-0001	Aleonelli@pittalaw.com
Mechanic's Lienholder	Nouveau Elevators Industries LLC		360 Old Country Rd Ste 205	Romano & Associates		Garden City	NY	11530	info@dos.ny.gov
Lienholder	NW Hudson Lender LLC	c/o Northwind Group	490 Fifth Ave., 28th Floor			New York	NY	10017	
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SEC Regional Office	Securities & Exchange Commission	NY Regional Office	Regional Director	100 Pearl St., Suite 20-100		New York	NY	10004-2616	bankruptcy@royalabstract.com
SEC Regional Office	Securities & Exchange Commission	PA Regional Office	Regional Director	One Penn Center	1617 JFK Boulevard Ste 520	Philadelphia	PA	19103	bankruptcy@sec.gov
									nyrobankruptcy@sec.gov
									philadelphia@sec.gov

Exhibit A  
Core/2002 Service List  
Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Email
SEC Headquarters	Securities & Exchange Commission	Secretary of the Treasury	100 F St NE			Washington	DC	20549	SECBankruptcy-OGC-ADO@SEC.GOV; secbankruptcy@sec.gov
Mechanic's Lienholder	Superior Chutes		30 N. 15th Street			East Orange	NJ	07017	
Mechanic's Lienholder	The Square NYC Corp	Judith Friedman	10 E 39th St Ste 1117			New York	NY	10016	
Mechanic's Lienholder	Tritech Electrical Data Inc	Mark Nash	4288 Katonah Ave			Bronx	NY	10470	
US Attorney for District of Delaware	US Attorney for District of Delaware	US Attorney for Delaware	1313 N Market Street	Hercules Building		Wilmington	DE	19801	usade.ecfbankruptcy@usdoj.gov
Mechanic's Lienholder	V10 Specialties		29-12 38th Ave			Long Island City	NY	11101	
Counsel to Alberto and Salomon Smeke Saba (the former owners of the Debtors); and CSC Hudson LLC	Vedder Price P.C.	Attn Robert Salame, David Rownd and Michael L. Schein	1633 Broadway, 31st Floor 2701 E Camelback Road Ste 110			New York	NY	10019	rsalame@vedderprice.com; drownd@vedderprice.com; mschein@vedderprice.com
Lienholder	Western Alliance Bancorp					Phoenix	AZ	85016	
Counsel to Alberto Smeke Saba and Salomon Smeke Saba and CSC Hudson LLC	Womble Bond Dickinson (US) LLP	Matthew P. Ward	1313 North Market Street, Suite 1200			Wilmington	DE	19801	matthew.ward@wbd-us.com