

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

Hudson 1701/1706, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 25-11853 (KBO)

(Jointly Administered)

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

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

APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF MORRIS JAMES LLP AS
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS EFFECTIVE AS OF DECEMBER 5, 2025

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned cases hereby submits this Application for the Entry of an Order Authorizing the Retention and Employment of Morris James LLP (“Morris James”) as Co-Counsel to the Official Committee of Unsecured Creditors effective as of December 5, 2025 (the “Application”). In support of this Application, the Committee relies on the declaration of Eric J. Monzo (the “Monzo Declaration”) attached as **Exhibit B** and the declaration of Nicole Vaknin, on behalf of The Abadi Group, Chairperson of the Committee, (the “Vaknin Declaration”) attached as **Exhibit C**. In support of the Application, the Committee respectfully represents as follows:

JURISDICTION

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this Application is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Hudson 1701/1706, LLC (0281) and Hudson 1702, LLC (0190). The Debtors’ mailing address is c/o FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.



2. The statutory bases for the relief requested herein are sections 1103(a) and 328(a) of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”), Rules 2014 and 2016 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”).

BACKGROUND

3. On October 22, 2025, (the “Petition Date”), the above-captioned debtors (the “Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively the “Chapter 11 Cases”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

4. The Debtors have continued in the possession of its property and has continued to operate and manage its business as Debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

5. On November 25, 2025, the United States Trustee for the District of Delaware (the “United States Trustee”) filed its *Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 104] of the three (3) member Committee pursuant to section 1102(a)(1) of the Bankruptcy Code.² On December 4 and 5, 2025, respectively, the Committee selected Seward & Kissel LLP as its proposed lead counsel and Morris James LLP as its proposed Delaware co-counsel. On December 8, 2025, the Committee selected Province, LLC as its proposed financial advisor.

² The Committee members are the following: (1) 356W58 Ground Lessor LLC; (2) The Abadi Group; and (3) AJP Contracting Corp.

RELIEF REQUESTED

6. By this Application, the Committee seeks to retain and employ Morris James, as Delaware counsel to the Committee effective as of December 5, 2025, pursuant to 11 U.S.C. § 328(a) and 1103(a). The Committee understands that Morris James will seek compensation from the Debtors' estates at its regular hourly rates for attorneys and paraprofessionals, and reimbursement of expenses incurred on the Committee's behalf, subject to prior Court approval after notice and a hearing.

7. The Committee seeks to retain Morris James as its Delaware counsel because of Morris James' experience and knowledge in the field of business reorganizations under Chapter 11 of the Bankruptcy Code and because of Morris James' experience and knowledge practicing before this Court.

8. Subject to Court approval in accordance with section 330(a) of the Bankruptcy Code, compensation will be payable to Morris James on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Morris James. The principal attorneys and paralegals presently expected to represent the Committee are as follows:

<u>Individual</u>	<u>Position</u>	<u>2025 Hourly Rate</u>	<u>2026 Hourly Rate</u>
Eric J. Monzo	Partner	\$905.00	\$1,025.00
Siena B. Cerra	Associate	\$425.00	\$450.00
Samantha L. Rodriguez	Associate	\$400.00	\$435.00
Stephanie Lisko	Paralegal	\$385.00	\$425.00
Douglas J. Depta	Paralegal	\$385.00	\$425.00
Jessica M. O'Connor	Paralegal	\$385.00	\$425.00

The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions, typically annually. The hourly rates are subject to periodic adjustments, which typically occur annually on or about January 1, to reflect economic and other conditions. Morris James will advise the Committee, the Debtors, and the U.S. Trustee of any increases in its hourly rates. Other

attorneys and paralegals employed by Morris James may from time to time serve the Committee in connection with the matters herein described.

9. These rates are set at a level designed to fairly compensate Morris James for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. Morris James will also charge for normal and customary expenses incurred in connection with the Chapter 11 Cases.

10. The expenses charged may include, among other things, ECF charges, telephone and telecopy charges, mail and express mail charges, special or hand delivery charges, document retrieval, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by Morris James to outside copying services for use in mass mailings, travel expenses, expenses for “working meals,” computerized research, transcription costs, as well as non-ordinary overhead expenses such as secretarial and other overtime. Any such expenses will be recorded in accordance with Morris James’ customary practices and will be incurred at the same rates as customarily charged in similar engagements, or as otherwise limited by the Local Rules or any order of the Court.

11. Subject to Court approval, and in consultation with its co-counsel, Seward, so as to avoid duplication of effort, the professional services that Morris James will render to the Committee include, but shall not be limited to, the following:

- providing legal advice and assistance to the Committee in its consultations with the Debtors relative to the Debtors’ administration of its reorganization;
- reviewing and analyzing all applications, motions, orders, statements of operations and schedules filed with the Court by the Debtors or third parties, advising the Committee as to their propriety, and, after consultation with the Committee, taking appropriate action;

- preparing necessary applications, motions, answers, orders, reports, and other legal papers on behalf of the Committee;
- representing the Committee at hearings held before the Court and communicating with the Committee regarding the issues raised, as well as the decisions of the Court; and
- performing other legal services for the Committee which may be reasonably required in this proceeding.

12. In addition to the services listed above, Morris James, in accordance with counsel's obligations, will, prior to signing and filing the same, review, in detail, all pleadings, motions, responses, objections, and other documents prepared by co-counsel, and will provide comments thereon. Morris James will assure that any pleadings comply with the Local Rules. Morris James will advise the Committee on matters of Delaware practice and procedure and Delaware law. A Morris James attorney will also personally attend all proceedings before the Court, and will attend meetings in Delaware between the Committee, the Debtors, and/or other parties in interest at which Committee counsel is requested, or required, to be present. Morris James will also, upon identification of such matters, handle any matter (if any) where co-counsel has determined that it has a conflict.

13. Morris James has conducted a review of potential conflicts with respect to all known creditors and equity holders of the Debtors' estates that have been identified to date by the Debtors. Subject to further review and supplementation as required by Bankruptcy Rule 2014 and Local Bankruptcy Rule 2014-1, the potential conflicts identified by Morris James' conflict check are listed on Schedule 1 to the Monzo Declaration. To the extent required, Morris James will periodically update its disclosures.

14. To the best of the Committee's knowledge, and except as disclosed herein and in the Monzo Declaration, neither Morris James, nor any of its partners, counsel, or associates,

represents any interest adverse to the Debtors, their estates, their creditors, or the Committee, in the matters upon which Morris James is to be engaged. Brya M. Keilson, a Partner at Morris James, was a trial attorney at the Office of the United States Trustee until March 13, 2019. Ms. Keilson did not have any responsibility with these Chapter 11 Cases during her tenure at the United States Trustee's Office. Morris James is a "disinterested person," as the Committee understands this term to be defined, within the meaning of section 101(14) of the Bankruptcy Code, as modified by section 1103(b) of the Bankruptcy Code.

15. To the best of the Committee's knowledge, and except as disclosed in the annexed Monzo Declaration, Morris James has no prior connection with the Debtors, its creditors, or any other party-in-interest, or their respective attorneys or accountants, in the matters upon which it is to be engaged that would in any way disqualify it from representing the Committee.

16. Morris James has indicated a willingness to act as counsel on the Committee's behalf, in accordance with the terms of this Application.

17. The Committee submits that it is necessary to employ Morris James as counsel to ensure that the interests of the Debtors' unsecured creditors are represented adequately in an efficient and effective manner. The Committee believes that, in light of Morris James' familiarity with the facts of the Chapter 11 Cases, as well as its understanding and knowledge of the Debtors' business issues, and its extensive experience before this Court, Morris James is well-suited to provide legal services to the Committee.

18. Because the Committee requested and retained the services of Morris James on December 5, 2025, the Committee requests that any order entered authorizing such retention be effective as of December 5, 2025.

NOTICE

19. 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 need be given.

NO PRIOR REQUEST

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

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WHEREFORE, the Committee requests entry of an Order substantially in the form attached hereto as **Exhibit A**, authorizing the Committee to retain and employ Morris James as counsel for the Committee, effective as of December 5, 2025, and granting such other and further relief as is 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.*,

Debtors.¹

Chapter 11

Case No. 25-11853 (KBO)

(Jointly Administered)

Re: Docket No. _____

**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF
MORRIS JAMES LLP AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EFFECTIVE AS OF DECEMBER 5, 2025**

Upon consideration of the Application for Entry of an Order Authorizing and Approving the Employment of Morris James LLP (“Morris James”) as co-counsel for the Official Committee of Unsecured Creditors (the “Committee”), effective as of December 5, 2025 (the “Application”),² upon the Declaration of Eric J. Monzo, an attorney with Morris James, in support of the Application (the “Monzo Declaration”), and upon the Declaration of Nicole Vaknin, in support of the Application (the “Vaknin Declaration”); the Court being satisfied based on the representations made in the Application and in the Monzo Declaration that said attorneys represent no interest adverse to the Committee, that they are disinterested persons as that term is defined under section 101(14) of the Bankruptcy Code, as modified by section 1103(b) of the Bankruptcy Code, and that their employment is necessary and would be in the best interests of the Committee, and after due deliberation and sufficient cause appearing therefor;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Hudson 1701/1706, LLC (0281) and Hudson 1702, LLC (0190). The Debtors’ mailing address is c/o FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

² Capitalized terms not otherwise defined herein shall have the meanings set forth in the Application.

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.
2. Pursuant to sections 328 and 1103(a) of the Bankruptcy Code, the Committee is authorized to retain and employ Morris James as counsel, effective as of December 5, 2025.
3. Morris James shall be entitled to allowance of compensation and reimbursement of expenses upon the filing and approval of interim and final applications pursuant to the Bankruptcy Rules, the Local Bankruptcy Rules, and such other orders as this Court may direct.
4. Morris James shall apply for compensation and professional services rendered and reimbursement of expenses incurred in connection with the Debtors' Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code, and applicable provisions of the Bankruptcy Rules, the Local Bankruptcy Rules, and such other procedures as may be fixed by order of this Court. Morris James also intends to make a reasonable effort to comply with the United States 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 Case Effective as of November 1, 2013*, both in connection with this Application and the interim and final fee applications to be filed by Morris James in the Chapter 11 cases.
5. Morris James shall not be reimbursed for fees and expenses for defending any objection to Morris James' fee application under the Bankruptcy Code.
6. Morris James shall not charge a markup to the Committee with respect to fees billed by contract attorneys who are hired by Morris James to provide services to the Committee and shall ensure that any such contract attorneys are subject to conflict checks and disclosures in accordance with the requirements of the Bankruptcy Code and the Bankruptcy Rules.

7. Morris James shall provide ten-business-days' notice to the Debtors, the United States Trustee, and the Official Committee of Unsecured Creditors before any increases in the rates set forth in the Application are implemented and shall file such notice with the Court. The United States Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth 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.

8. To the extent the Application, the Monzo Declaration, and the Vakin Declaration are inconsistent with this Order, or any agreements between the Committee and Morris James are inconsistent with this Order, the terms of this Order shall govern.

9. The Court shall retain jurisdiction to hear and determine all matters arising from the implemental of this Order.

EXHIBIT B

Monzo Declaration

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

In re:

Hudson 1701/1706, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 25-11853 (KBO)

(Jointly Administered)

**DECLARATION OF ERIC J. MONZO IN SUPPORT OF APPLICATION FOR ENTRY
OF AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF
MORRIS JAMES LLP AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EFFECTIVE AS OF DECEMBER 5, 2025**

I, Eric J. Monzo, being duly sworn, declare pursuant to 28 U.S.C. § 1746, under penalty of perjury that deposes and says:

1. I am a partner with the law firm of Morris James LLP (“Morris James” or the “Firm”)² with offices located at 3205 Avenue North Blvd., Suite 100, Wilmington, Delaware 19803 and am duly admitted to practice law in the State of Delaware, the United States District Court for the District of Delaware, the United States Court of Appeals for the Third Circuit and other courts located in Maryland, New Jersey, and Pennsylvania.

2. I submit this Declaration pursuant to Rule 2014 of the Federal Rules of Civil Procedure in support of the *Application for Entry of an Order Authorizing the Retention and Employment of Morris James LLP as Co-Counsel to The Official Committee of Unsecured Creditors Effective as of December 5, 2025* (the “Application”). The information set forth herein regarding connections to parties-in-interest and fees and expenses is based primarily upon books and records of the Firm and information provided by other attorneys and personnel at Morris

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Hudson 1701/1706, LLC (0281) and Hudson 1702, LLC (0190). The Debtors’ mailing address is c/o FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

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

James. Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein, which is true and correct, and if called as a witness, would testify competently thereto.

3. In preparing this declaration, I and other attorneys within the Firm followed Morris James' conflict procedures, which are intended to adhere to the requirements of the Bankruptcy Code and Bankruptcy Rules for retention of professionals and the Rules of Professional Conduct governing members of the bar for the State of Delaware. I have received a list of significant interested parties in this case and submitted the names of these parties through the Firm's conflicts resolution system.

4. In connection with preparing this Declaration, Morris James submitted the names of parties-in-interest in the Chapter 11 Cases (the "Parties-in-Interest") for review in the computerized conflict database system maintained by Morris James. The list of the Parties-in-Interest was obtained from the above-captioned Debtors. Morris James maintains and systematically updates its conflict check system in the regular course of business of the Firm, and it is the regular practice of the Firm to make and maintain these records. The conflict check system maintained by Morris James is designed to include every matter on which the Firm is now or has been engaged, the entity for which the Firm is now or has been engaged, and in each instance, the identity of related parties and adverse parties and the attorney in the Firm that is knowledgeable about the matter. It is the policy of Morris James 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, as well as related and adverse parties. Accordingly, the database is regularly updated for every new matter undertaken by Morris James.

5. The Parties-in-Interest which Morris James submitted to its conflict database include, but are not limited to, the following categories derived from various pleadings and docket entries as set forth on **Schedule 1**, as follows:

- i. Debtors;
- ii. Non-Debtor Affiliates;
- iii. Lender;
- iv. Banks & Financial Institutions;
- v. Managers, Officers & Key Personnel;
- vi. Former Equity Holders/Management;
- vii. Bankruptcy Professionals;
- viii. Brokers & Insurers;
- ix. Other Professionals;
- x. Landlords & Lessors;
- xi. Mechanics Lienholders;
- xii. Contractors;
- xiii. Taxing & Governmental Authorities;
- xiv. Regulatory Bodies;
- xv. Top 20 Unsecured Creditors;
- xvi. Bankruptcy Judges & Staff;
- xvii. United States Trustee & Staff;
- xviii. Utilities;
- xix. Litigation Parties; and
- xx. Any parties entering a notice of appearance, as set forth therein.

6. Upon a review of the report generated by our conflicts search, I do not represent and, to the best of my knowledge, none of the other attorneys of Morris James currently represent any of the searched entities except as set forth on the schedule annexed hereto as **Schedule 2**. The various matters set forth on **Schedule 2** are unrelated to the Debtors or the Chapter 11 Cases.

7. I do not have and, to the best of my knowledge, none of the other attorneys of Morris James have, any connection with the Debtors, their major creditors, or any other significant Party-in-Interest which would disqualify Morris James from this representation.

8. Based on the conflicts and connection search conducted and described herein, to the best of my knowledge, neither I, or Morris James, nor any partner, counsel, or associate thereof, insofar as I have been able to ascertain, have any connection with the Debtors or any other Parties-in-Interest herein, except as stated below and as set forth on **Schedule 2**.

9. Brya M. Keilson, Partner with the Firm, was a trial attorney at the Office of the United States Trustee for Region 3 until March 13, 2019. During her tenure at the United States Trustee's Office, she did not work on this matter. In accordance with Bankruptcy Rule 2014, Morris James does not have any other connection with the Office of the United States Trustee for the District of Delaware, or any persons employed by the United States Trustee, except as set forth on **Schedule 2**.

10. The Honorable Thomas M. Horan was formerly associated with Morris James as an attorney in private practice. In accordance with Bankruptcy Rule 2014, Morris James does not have any other connection with the Bankruptcy Judges and staff except as set forth on **Schedule 2**.

11. From time to time, Morris James may represent, or may have represented one or more of the Debtors' creditors or other parties in matters unrelated either to the Debtors' Chapter 11 Cases or to those entities' transactions or dealings with the Debtors. Morris James is not representing any of those entities in the Chapter 11 Cases in any claims that they may have collectively or individually against the Debtors.

12. Neither I, Morris James, nor any partner, counsel, or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors, or any other Parties-in-Interest herein, or their respective attorneys and accountants, except as stated herein.

13. Morris James has previously worked with and may continue to work with one or more of the Debtors' professionals on various representations in matters unrelated to the Chapter 11 Cases, at times representing the same parties and at other times representing parties with similar interests or parties with adverse interests.

14. Morris James is a "disinterested person" as that term is defined in section 101(14) of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the "Bankruptcy Code"), as modified by section 1103(b) of the Bankruptcy Code, in that the Firm, its partners, counsel, and associates:

- are not creditors, or insiders of the Debtors;
- are not and were not within two (2) years before the date of the filing of the Debtors' Chapter 11 petition, a director, officer, or employee of the Debtors; and
- do not have an interest materially adverse to the interest of the Debtors' estate 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, except as disclosed herein.

15. As of the date hereof, the Firm has conducted a review of potential conflicts as to the entities identified at **Schedule 1** hereto. Morris James has followed its standard conflict procedures with respect to potential conflicts, and Morris James is aware of its continuing obligation to review and supplement its conflict review pursuant Bankruptcy Rule 2014 and Local Bankruptcy Rule 2014-1. Morris James and certain of its partners, counsel and associates may have in the past represented, and may currently represent and likely in the future will represent interested parties in connection with matters unrelated to the Chapter 11 Cases. A list of potential

conflicts, including parties in which Morris James has any connection to, including those it represented and currently represents in unrelated matters is attached hereto as **Schedule 2**.

16. Morris James will not represent any of the entities identified on **Schedule 1** in their individual capacities in the Chapter 11 Cases. As appropriate, other counsel will serve as Committee counsel for such matters, or the Committee will seek approval of retention of additional conflicts counsel.

17. The Firm intends to apply for compensation for professional services rendered in connection with the Chapter 11 Cases subject to approval of this Court and compliance with applicable provisions of the Bankruptcy Code, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by the Firm. Although Morris James may utilize the services of additional attorneys, the principal attorneys and paralegals likely to represent the Committee in this case are as follows:

<u>Individual</u>	<u>Position</u>	<u>2025 Hourly Rate</u>	<u>2026 Hourly Rate</u>
Eric J. Monzo	Partner	\$905.00	\$1,025.00
Siena B. Cerra	Associate	\$425.00	\$450.00
Samantha L. Rodriguez	Associate	\$400.00	\$435.00
Stephanie Lisko	Paralegal	\$385.00	\$425.00
Douglas J. Depta	Paralegal	\$385.00	\$425.00
Jessica M. O'Connor	Paralegal	\$385.00	\$425.00

Other attorneys and paralegals may from time to time assist the Committee in connection with the matters herein described and are subject to periodic adjustment to reflect economic or other conditions.

18. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions, typically annually. The hourly rates are subject to periodic adjustments, which typically occur annually on or about January 1, to reflect economic and other conditions. Morris James will advise the Committee, the Debtors, and the U.S. Trustee of any

increases in its hourly rates. These rates are set at a level designed to fairly compensate the Firm for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. The expenses charged include, among other things, telephone and telecopy toll and other charges, mail and express mail charges, special or hand delivery charges, document retrieval, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by the Firm to outside copying services for use in mass mailings, travel expenses, expenses for “working meals,” computerized research, and transcription costs. Any such expenses will be recorded in accordance with Morris James’ customary practices and will be incurred at the same rate as customarily charged in similar engagements or as otherwise limited by the local rules of the Court.

19. Subject to Court approval, and in consultation with lead counsel Seward & Kissel LLP (“Seward”), so as to avoid duplication, the professional services that Morris James will render to the Committee include, but shall not be limited to, the following:

- Provide legal advice and assistance to the Committee in its consultation with the Debtors relative to the Debtors’ administration of its reorganization and the Chapter 11 Cases;
- Review and analyze all applications, motions, orders, statements of operations, and schedules filed with the Court by the Debtors or third parties, advise the Committee as to their propriety, and after consultation with the Committee, take appropriate action;
- Prepare necessary applications, motions, responses, answers, orders, reports, and other legal papers on behalf of the Committee;
- Represent the Committee at hearings held before the Court and communicate with the Committee regarding the issues raised, as well as the decisions of the Court; and
- Performing such other legal services to the Committee in connection with the prosecution of the Chapter 11 Cases as are necessary and appropriate.

20. In addition to the services listed above, Morris James, in accordance with co-counsel's obligations, will prepare and review all pleadings, motions, responses, objections, and other documents prepared on behalf of the Committee. Morris James will assure that any pleadings comply with the Local Rules. Morris James will advise the Committee on matters of Delaware practice and procedure and Delaware law. Morris James has substantial experience in Delaware courts and dealing with issues in the Court. A Morris James attorney will also personally attend all proceedings before the Court and will attend all meetings in Delaware between the Committee, the Debtors, and/or Parties-in-Interest at which Committee counsel is requested, or required, to be present after consulting with lead counsel. Morris James will also, upon identification of such matters, handle any matters where lead counsel has determined that it has a conflict to ensure compliance with the United States Trustee Guidelines.

21. Pursuant to Part F of the 2013 U.S. Trustee Guidelines, Morris James is proposed to serve as co-counsel for the Committee with Seward. In the Application and this Declaration, I disclose, in general, the services to be provided to the Committee by Morris James. In some cases, the description of these services may appear duplicative of the services set forth in Seward's retention application. Morris James expects that there will be occasions where Seward will take the lead role in drafting or responding to pleadings, or otherwise addressing issues. On other occasions, Morris James will be tasked to take the lead on issues and matters. In such instances, Morris James and Seward do not expect to duplicate services.

22. To the extent that Morris James is assigned by the Committee, in consultation with Seward, to perform new matters as requested by the Committee that may be necessary and proper in these proceedings and that are materially different from the above described services and the services described in the Application or this Declaration, Morris James will file a supplemental

declaration in accordance with Bankruptcy Rule 2014, as required by Part F.1.c of the United States Trustee Guidelines.

23. No promises have been received by the Firm nor by any partners, counsel, or associate thereof as to compensation in connection with the Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code. The Firm has no agreement with any other entity to share with such entity any compensation received by the Firm in connection with the Chapter 11 Cases, except among the partners, counsel, and associates of the Firm.

24. To the extent that the Firm discovers any connection with any interested party or enters into any new relationship with any interested party, the Firm will promptly supplement its disclosure to the Court.

25. In order to comply with the United States Trustees' Appendix B – Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, as required to be answered in all applications for employment filed under section 327 or 1103 of the Bankruptcy Code, which became effective on November 1, 2013, I make the following disclosures:

- a. Morris James did not agree to a variation of its standard or customary billing arrangements for this engagement;
- b. None of the professionals included in this engagement have varied their rate based upon the geographic location of the Chapter 11 Cases; and
- c. The Committee retained Morris James on December 5, 2025. The billing rates for the period prior to this application are the same as indicated in this application;
- d. Morris James anticipates filing a budget at the time it files its interim fee applications. In accordance with the United States Trustee Guidelines, the budget may be amended as necessary to reflect changed circumstances or unanticipated developments.

The facts set forth in the Application and herein are true and correct to the best of my knowledge, information, and belief.

Dated: December 23, 2025

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

SCHEDULE 1
Interested Parties List

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 & Financial Institutions

Western Alliance Bancorporation
Flagstar Bank

Managers, Officers & 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
Seward & Kissel LLP

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 Unsecured Creditors

356W58 Ground Lessor
Fitness International, LLC
Alberto Smeke Saba
Saloman Smeke Saba
HUB
Nouveau Elevators
FS Site
Mulligan Security
DMV Mechanical
NY City Department of Environmental
Protection
Abadi
Firecom Inc.
Ditchik & Ditchik
Universal Stone
Lighting Workshop
Johnson Controls
AJP
Tiger Cabinets Inc.
Lawrence Glass
Nonstop Plumbing

Bankruptcy Judges and Staff

Judge Laurie Selber Silverstein
Judge John T. Dorsey
Judge Craig T. Goldblatt
Judge Thomas M. Horan
Judge Karen B. Owens
Judge Brendan L. Shannon
Judge J. Kate Stickles
Judge Mary F. Walrath
Stephen L. Grant, Sr
Lauren Attix
James R. O'Malley
Demitra Yeager
Nickita Barksdale
Amanda Hrycak
Danielle Gadson
Jill Walker

Rachel Bello
Paula Subda
Claire Brady
Marquietta Lopez
Laura Haney
Nikki Washington
Cacia Batts
Lora Johnson
Al Lugano

United States Trustee and Staff

Timothy J. Fox, Jr.
Benjamin Hackman
Hannah M. McCollum
Jane Leamy
Joseph McMahon
Linda Casey
Linda Richenderfer
Malcolm M. Bates
Michael Girello
Nyanquoi Jones
Shakima L. Dortch
Jonathan Lipshie
Jonathan Nyaku
Joseph Cudia
Holly Dice
Christine Green
Hawa Konde

Utilities

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

Litigation Parties

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

SCHEDULE 2

<u>CLIENT</u>	<u>RELATIONSHIP TO DEBTORS</u>	<u>MATTER</u>
Con Edison	Contractors Utilities	The Firm currently represents or represented Con Edison Clean Energy Businesses, Inc. in a matter unrelated to these Chapter 11 Cases
Dreyer, Michelle A.	Former Equity Holders/Management	The Firm currently represents Corporation Service Company, Michelle Dreyer's employer, in matters unrelated to these Chapter 11 Cases.
Fox, Jr., Timothy J.	United States Trustee and Staff	The Firm previously represented an individual named Timothy Fox in a non-bankruptcy matter unrelated to these Chapter 11 Cases.
Gilbar	Contractors	The Firm previously represented Gilbar Trading, Inc. in a matter unrelated to these Chapter 11 Cases.
Johnson Controls	Contractors Top 20	The Firm has previously represented and is currently adverse to Johnson Controls in matters unrelated to these Chapter 11 Cases.
Lloyd's of London	Broker & Insurers	The Firm has previously represented Lloyd's of London or its affiliates in matters unrelated to these Chapter 11 Cases.
Thomas, Elizabeth	United States Trustee and Staff	The Firm previously represented an individual named Elizabeth Thomas in a non-bankruptcy matter unrelated to these Chapter 11 Cases.
Walker, Jill	Bankruptcy Judges and Staff	The Firm has previously represented an individual named Jill Walker in a non-bankruptcy matter unrelated to these Chapter 11 Cases.

**(MORRIS JAMES' CONFLICT RESOLUTION PROCEDURE
IS ONGOING, AND MORRIS JAMES WILL UNDERTAKE
TO SUPPLEMENT THIS DECLARATION AS NECESSARY)**

EXHIBIT C

Vaknin Declaration

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

In re:

Hudson 1701/1706, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 25-11853 (KBO)

(Jointly Administered)

**DECLARATION OF NICOLE VAKNIN IN SUPPORT OF APPLICATION FOR ENTRY
OF AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF
MORRIS JAMES LLP AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EFFECTIVE AS OF DECEMBER 6, 2025**

Pursuant to 28 U.S.C § 1746, I, Nicole Vaknin, hereby submit this declaration (the “Declaration”) under penalty of perjury:

1. My name is Nicole Vaknin, I am over the age of 21 and I am a representative of The Abadi Group. I am competent in all respects to make this declaration and serve as Chairperson of 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”), with authority to execute this Declaration in support of the Committee’s application to retain Morris James LLP (“Morris James”) as co-counsel pursuant to section 1103 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). I make this Declaration solely in the capacity as chair and a member of the Committee, on behalf of The Abadi Group and not in any personal capacity. The facts set forth in this Declaration are based upon my personal knowledge, my review of the relevant documents, information provided to me or verified by Committee counsel, and my personal opinion based upon my experience, knowledge, and information provided to me.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Hudson 1701/1706, LLC (0281) and Hudson 1702, LLC (0190). The Debtors’ mailing address is c/o FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

2. I have reviewed and am familiar with the contents of the *Application for Entry of an Order Authorizing the Retention and Employment of Morris James LLP as Co-Counsel to The Official Committee of Unsecured Creditors Effective as of December 5, 2025* (the “Application”).² In support of the Application, the Committee relies upon the Monzo Declaration, which is attached to the Application as **Exhibit A**.

3. The Committee interviewed and considered a number of law firms to act as lead counsel in this matter prior to selecting Seward & Kissel LLP (“Seward”). Seward was selected as lead counsel on December 5, 2025. Morris James was selected as its Delaware co-counsel on December 5, 2025. The Committee selected Morris James because of Morris James’ extensive general legal experience and knowledge, and, in particular, its substantial experience in representing official committees of creditors and recognized expertise in the field of creditors’ rights and business reorganization under chapter 11 of the Bankruptcy Code, particularly in cases pending before the United States Bankruptcy Court for the District of Delaware, both as co-counsel and lead counsel. The Committee understands that Morris James’ expertise includes representing official creditors’ committees in large and complex bankruptcy cases, as set forth in the Monzo Declaration. The Committee understands that since the Committee’s appointment, Morris James has been working closely with Seward and other Committee professionals, the Debtors, and other parties-in-interest to become familiar with the Debtors’ businesses and many of the potential legal issues that may arise in the context of these Chapter 11 Cases. For these reasons, the Committee believes that Morris James is well-qualified and uniquely able to represent the Committee in the Chapter 11 Cases in an efficient and timely manner.

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

4. The members of the Committee reviewed Morris James' standard rates for bankruptcy services, as set forth in the Application. Based upon representations made to the Committee by Morris James, the Committee understands that those rates are generally consistent with Morris James' rates for comparable non-bankruptcy engagements and the billing rates and terms of other comparably skilled firms for providing similar services. Based on these representations and the Committee members' experience in the bankruptcy field, the Committee believes these rates are reasonable.

5. The Committee will approve any prospective budget and staffing plan provided by Morris James, recognizing that, in the course of large chapter 11 cases like these Chapter 11 Cases, it is possible that there may be a number of unforeseen fees and expenses that will need to be addressed by the Committee and Morris James. The Committee further recognize that it is the Committee's responsibility to closely monitor the billing practices of its professionals to ensure the fees and expenses paid by the estates remain consistent with the Committee's expectations and the exigencies of the Chapter 11 Cases. The Committee will continue to review the invoices that Morris James regularly submits, and, together with Morris James, periodically amend any budget and staffing plans, as the Chapter 11 Cases develop.

6. 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.

[Remainder of page intentionally left blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States, that the foregoing statements are 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.*,

Debtors.¹

Chapter 11

Case No. 25-11853 (KBO)

(Jointly Administered)

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

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

**NOTICE OF APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING
THE RETENTION AND EMPLOYMENT OF MORRIS JAMES LLP AS
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS EFFECTIVE AS OF DECEMBER 5, 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 for Entry of an Order Authorizing the Retention and Employment of Morris James LLP as Co-Counsel to the Official Committee of Unsecured Creditors Effective as of December 5, 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)**. 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.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Hudson 1701/1706, LLC (0281) and Hudson 1702, LLC (0190). The Debtors’ mailing address is c/o FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

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

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*)
Catherine V. LoTempio (admitted *pro hac vice*)
Andrew J. Matott (admitted *pro hac vice*)
Thomas Ross Hooper (admitted *pro hac vice*)
One Battery Park Plaza
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lotempio@sewkis.com
matott@sewkis.com
hooper@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.¹

Chapter 11

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

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd 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 for Entry of an Order Authorizing the Retention and Employment of Morris James LLP as Co-Counsel to the Official Committee of Unsecured Creditors Effective as of December 5, 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)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Hudson 1701/1706, LLC (0281) and Hudson 1702, LLC (0190). The Debtors' mailing address is c/o FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

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
Proposed Counsel to the Debtors/ Proposed Special Counsel to the Debtors	DLA Piper LLP (US)	Neal Kronley and David M. Riley	1251 Avenue of the Americas			New York	NY	10020	statetreasurer@state.de.us
Proposed Counsel to the Debtors/ Proposed Special Counsel to the Debtors	DLA Piper LLP (US)	Stuart M. Brown	1201 North Market Street Suite 2100			Wilmington	DE	19801	neal.kronley@us.dlapiper.com;
Mechanic's Lienholder	Elysium Construction Inc	Alan Kenny	315 W 39th St Ste 705			New York	NY	10018	david.riley@us.dlapiper.com
Escrow Agent	First American Title Insurance Company	Attn Andrew Jaeger	666 Third Ave			New York	NY	10017	stuart.brown@us.dlapiper.com
Counsel for Western Alliance Bank	Frantzel Robins Bloom & CSATO, L.C.	Gerrick Warrington and Christopher Crowell	1000 Wilshire Boulevard, 19th Floor			Los Angeles	CA	90017-2427	ajaeger@firstam.com
Mechanic's Lienholder	Gardiner & Theobald Inc		801 Second Ave	Zetlin & De Chiara LLP		New York	NY	10017	garrington@frantzel.com;
Counsel for Western Alliance Bank	Gellert Seitz Busenkell & Brown, LLC	Michael Busenkell	1201 N. Orange Street, Suite 300			Wilmington	DE	19801	ccrowell@frantzel.com
Mechanic's Lienholder	Gilbar		498 7th Ave Floor 14			New York	NY	10018	mbusenell@gsbblaw.com
Litigation Plaintiffs	Hector Luciano Gonzalez	Liakas Law PC	40 Wall St Fl 50			New York	NY	10005-1373	
Counsel for Taconic Development Advisors LLC	Herrick, Feinstein LLP	Stephen B. Selbst	Two Park Ave			New York	NY	10016	sselbst@herrick.com
Counsel to Parkview Financial REIT, LP, Counsel to the DIP Lender and Prepetition Lender	Hogan Lovells US LLP	Chris Bryant	390 Madison Avenue			New York	NY	10017	chris.bryant@hoganlovells.com
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;
Debtor	Hudson 1701/1706, LLC	Attn Alan Tantleff	1166 Avenue of the Americas, 15th Floor	c/o FTI Consulting Inc.		New York	NY	10036	david.simonds@hoganlovells.com;
IRS	Internal Revenue Service	Attn Susanne Larson	31 Hopkins Plz Rm 1150			Baltimore	MD	21201	edward.mcneilly@hoganlovells.com;
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 Dolcium 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
Counsel to 356W58 Ground Lessor LLC	Landis Rath & Cobb LLP	Adam G. Landis, Matthew B. McGuire, Katherine S. Dute, and Soumya P. Venkateswaran	919 Market Street, Suite 1800			Wilmington	DE	19801	landis@lrclaw.com;mcguire@lrclaw.com;
Debtors' Landlord	MSP Capital Investments, LLC	Attn Danielle Ash and Morgan Stevens	555 Madison Avenue, 6th Floor	Adler & Stachenfeld LLP		New York	NY	10022	dute@lrclaw.com; venkateswaran@lrclaw.com
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	
US Trustee for District of DE	Office of the United States Trustee Delaware	Malcolm M Bates	844 King St Ste 2207			Wilmington	DE	19801	malcolm.m.bates@usdoj.gov
Counsel to Parkview Financial REIT, LP; PV Hudson LLC	Pachulski Stang Ziehl & Jones LLP	Jeffrey N. Pomerantz and James E. O'Neill	919 North Market Street, 17th Floor			Wilmington	DE	19801	jpomerantz@pszjlaw.com; joneill@pszjlaw.com
Litigation Plaintiffs	Raymond Hickey and Tana Hickey	Attn Daniel Joshua Wasserberg	1040 Avenue of the Americas Fl 10	Meirowitz & Wasserberg, LLP		New York	NY	10018-4799	dw@mwjnylaw.com
Escrow Agent	Royal Abstract of New York, LLC	Attn Michael Roberts	125 Park Ave Ste 1610			New York	NY	10017	mroberts@royalabstract.com
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

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