

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 AND APPROVING
THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS
EFFECTIVE AS OF DECEMBER 8, 2025

The Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) hereby files this application (the “Application”) for entry of an order, substantially in the form attached hereto as **Exhibit A**, pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 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”) authorizing and approving the employment of Province, LLC (“Province”) as financial advisor to the Committee in connection with the Debtors’ chapter 11 cases, effective as of December 8, 2025. In support of the Application, the Committee also files the *Declaration of Paul Navid* (the “Navid Declaration”), attached hereto as **Exhibit B** and incorporated herein by reference. In support of the Application, the Committee respectfully represents as follows:

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.



BACKGROUND

1. On October 22, 2025 (the “Petition Date”), the Debtors each filed their voluntary petitions with this Court under chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses and managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108(a) of the Bankruptcy Code. No trustee or examiner has been appointed in these chapter 11 cases.

2. On November 25, 2025, pursuant to section 1102(a)(1) of the Bankruptcy Code, the Office of the United States Trustee for Region 3, District of Delaware (the “U.S. Trustee”), appointed the Committee. *See* Docket No. 104. The following are the current members of the Committee: (i) 356W58 Ground Lessor LLC; (ii) The Abadi Group; and (iii) AJP Contracting Corp.

3. On December 8, 2025, the Committee selected Province as its proposed financial advisor.

4. Province has extensive experience representing official creditors’ committees, debtors, creditors, trustees, and others in a wide variety of bankruptcy cases, including, as (i) financial advisor to the official committees of unsecured creditors of A.B.C. Carpet, AgileThought, Alex and Ani, American Tire, Armstrong Flooring, Aruze Gaming, Ascena Group, Avadim Health, Avon Products, Barretts Minerals, Benitago, BL Restaurants Holding, Boundless Broadband, Carbonlite Holdings, CarePoint Health, Cherry Man Industries, Claire’s Holdings, Conn’s, Inc., Cyprus Mines, David’s Bridal, DCL Holdings (USA), Del Monte, Desktop Metal, Destination Maternity, DirectBuy Home Improvement, Eastern Outfitters, EHT US1 (Eagle Hospitality), Endo International, Exactech, Express, Forever 21, Francesca’s Holding Corporation, Harvest Sherwood, Honx, Hooters of America, Insys Therapeutics, Independent Pet Partners,

Invacare, J Crew, Kal Freight, LifeScan Global, Lucky's Market, L'Occitane, Lumio Holdings, Mallinckrodt, Meyer Burger, Mosaic Companies, Mountain Express Oil Company, Nielsen & Bainbridge (NBD Home), Neopharma, Noble House, One Web, Papyrus, Path Medical, Pier 1, PBS Brand Co. (Punch Bowl), Purdue Pharma, Prime Core Technologies, Prospect Medical, Restoration Forest Products Group, LLC, Reverse Mortgage, Revlon, Salt Life, Sientra, SiO2 Medical Products, South Hills Operations, Spicey Partners Real Estate Holdings, LLC, Stimwave Technologies, Surgalign, TECT Aerospace Group, The Rockport Company, True Religion Apparel, True Value, Tuesday Morning, US Magnesium, Virgin Orbit, Water Gremlin, Wesco Aircraft, White Stallion Energy, Whittaker, Clark & Daniels, and Winsor Terrace; (ii) financial advisor to the debtors 4E Brands, Basic Energy Services, Cherry Man Industries, Cinemex Holdings USA, Codiak BioSciences, Coin Cloud, Frontsight Management, Penthouse Global Media, Superior Linen, True Religion Apparel, WeWork and Woodbridge Group of Companies; and (iii) trustee or trustee advisor in Aegean Marine Petroleum, Advance Watch, American Apparel, Aruze Gaming, Borden Dairy, CS Mining, Cycle Force, DCL, EBH Topco, Eclipse Berry Farms, Energy & Exploration (ENXP), Fieldwood, Gump's, Invacare, La Paloma Generating Company, Limetree Bay Services, Invacare, Mallinckrodt, Maxus Energy, Neogenix, PBS Brand Co. (Punch Bowl), Promise Healthcare Group, Proterra, RadioShack Corporation, RMIT (Reverse Mortgage), Samson Resources, SiO2, Stimwave Technologies, and Vesta Holdings, among others.

JURISDICTION AND VENUE

5. The Court has jurisdiction to consider the Application 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 is a core proceeding under

28 U.S.C. § 157(b). Venue of these cases and the Application in this District is proper under 28 U.S.C. §§ 1408 and 1409.

6. The legal predicates for the relief requested herein are Bankruptcy Code sections 328(a) and 1103(a), Bankruptcy Rule 2014, and Local Rule 2014-1.

7. The Committee confirms its consent, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with the Application in the event that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

RELIEF REQUESTED

8. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form annexed hereto as **Exhibit A**, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, authorizing the Committee to employ and retain Province as its financial advisor in these chapter 11 cases. The Committee selected Province in furtherance of the efficient administration of the estates on behalf of the Committee. The Committee seeks to retain Province effective as of December 8, 2025, the date that Province began providing services to the Committee. The Committee believes that such retention is appropriate in these chapter 11 cases because the Committee required Province's assistance prior to such time as a retention application could be submitted to the Court due to the exigencies of these cases.

SCOPE OF EMPLOYMENT

9. Subject to further order of this Court, the services Province has rendered and may be required to render for the Committee, include without limitation, the following:

- a. becoming familiar with and analyzing the Debtor's DIP/Cash Collateral budget, assets and liabilities, and overall financial condition;

- b. reviewing financial and operational information furnished by the Debtor;
- c. monitoring the sale process, interfacing with the Debtor's professionals, and advising the Committee regarding the process;
- d. scrutinizing the economic terms of various agreements, including, but not limited to, various professional retentions;
- e. analyzing the Debtor's proposed business plans and developing alternative scenarios, if necessary;
- f. assessing the Debtor's various pleadings and proposed treatment of unsecured creditor claims therefrom;
- g. preparing, or reviewing as applicable, avoidance action and claim analyses;
- h. assisting the Committee in reviewing the Debtor's financial reports, including, but not limited to, statements of financial affairs, schedules of assets and liabilities, DIP/Cash Collateral budgets, and monthly operating reports;
- i. advising the Committee on the current state of this chapter 11 case;
- j. advising the Committee in negotiations with the Debtor and third parties as necessary;
- k. if necessary, participating as a witness in hearings before the Court with respect to matters upon which Province has provided advice; and
- l. other activities as are approved by the Committee, the Committee's counsel, and as agreed to by Province.

NO ADVERSE INTEREST OF PROFESSIONALS

10. To the best of the Committee's knowledge and based upon the Navid Declaration attached hereto, neither Province nor any of its employees have any connection with any party in interest, their attorneys or accountants, other than as set forth in the Navid Declaration.

11. To the best of the Committee's knowledge, except as provided in the Navid Declaration, neither Province, nor any of its employees represent any interest adverse to that of the Committee in the matters on which they are to be retained.

12. While Province has undertaken, and continues to undertake, efforts to identify connections with the Debtors and other parties-in-interest, it is possible that connections with some parties-in-interest have not yet been identified. Should Province, through its continuing efforts,

learn of any new connections of the nature described above, Province will promptly file supplemental declarations, as required by Bankruptcy Rule 2014(a).

13. Province represents many debtors, trustees, and committees in other bankruptcy cases, and the debtors, the members of those committees, or those estates may be creditors of the Debtors. However, Province will not represent those debtors, committees, or estates with respect to any claims that they may collectively or individually have against the Debtors.

PROFESSIONAL COMPENSATION

14. The Committee desires to employ Province and to have Province compensated with reasonable fees to be determined by the Court. No compensation will be paid to Province except upon compliance with the Bankruptcy Code, Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of this Court. Province has received no retainer in these cases to represent the Committee. Neither the Committee nor any of its members (or their representatives) are or will be liable for any fees or costs incurred by Province in its representation of the Committee. Province's current standard hourly rates are:

<u>Professional Level</u>	<u>Per Hour (USD)</u>
Managing Directors and Partners	\$850-\$1,450
Vice Presidents, Directors, and Senior Directors	\$700-\$1,050
Analysts, Associates, and Senior Associates	\$350-\$825
Paraprofessional / Admin	\$270-\$450

15. Effective as of January 1, 2026, Province is raising its market rates for its services of like kind to the following revised hourly rates, (for which the Application shall serve as notice thereof):

<u>Professional Level</u>	<u>Per Hour (USD)</u>
Managing Directors and Partners	\$900-\$1,600
Vice Presidents, Directors, and Senior Directors	\$700-\$1,050
Analysts, Associates, and Senior Associates	\$370-\$750
Paraprofessional/Admin /Interns	\$270-\$380

16. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Province intends to provide notice to the Debtors, the Committee, and the U.S. Trustee before implementing any increases in Province's rates for professionals working on these chapter 11 cases.

17. In addition, Province will bill for all out-of-pocket expenses reasonably and actually incurred by Province in connection with the matters contemplated by this Application.

NOTICE

18. 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 submits that, in light of the nature of the relief requested and the circumstances surrounding the Chapter 11 Cases, no other or further notice is required or necessary.

NO PRIOR REQUEST

19. No prior request for the relief sought herein has been made to this or any other Court.

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WHEREFORE, the Committee requests that the Court enter the order (the “Order”) annexed hereto as **Exhibit A**, (i) approving the retention and employment of Province as its financial advisor, effective as December 8, 2025, to render services as described above with compensation to be paid as an administrative expense in such amounts as this Court may hereafter determine and allow; and (ii) granting 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.*,

Debtors.¹

Chapter 11

Case No. 25-11853 (KBO)

(Jointly Administered)

Re: Docket No. ____

**ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT
OF PROVINCE, LLC AS FINANCIAL ADVISOR TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS
EFFECTIVE AS OF DECEMBER 8, 2025**

This matter came before the Court on the *Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 8, 2025* (the “Application”)² and the *Declaration of Paul Navid* filed in support of the Application (the “Navid Declaration”) both filed by the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession, pursuant to sections 328(a) and 1103(a) of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 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”) for an order authorizing and approving the retention and employment of Province, LLC (“Province”) as financial advisor for the Committee in these chapter 11 cases; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. § 1334; and consideration of the Application and the relief requested therein being a core proceeding pursuant

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.

to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and it appearing to the Court that the said Application should be approved, it is, therefore, ORDERED that:

1. The Application is granted as set forth herein.
2. Pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, the Committee is authorized to employ and retain Province as financial advisor to the Committee effective as of December 8, 2025.
3. Province shall apply for compensation for professional services rendered and reimbursement of expenses reasonably and actually incurred in connection with the Debtors' cases as set forth in the Application and in compliance with sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, the Local Rules, and any other applicable procedures and orders of this Court.
4. Notwithstanding anything to the contrary in the Application or the Navid Declaration, Province shall not seek reimbursement of any fees or costs arising from the defense of any of Province's fee applications in these chapter 11 cases.
5. Notwithstanding anything in the Application to the contrary, Province shall (i) to the extent that it uses the services of independent contractors or subcontractors (collectively, the "Contractors") in these cases, pass through the cost of such Contractors at the same rate that Province pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors are subject to the same conflicts checks as required for Province; and (iv) file with this Court such disclosures required by Bankruptcy Rule 2014.

6. Province shall provide ten (10) business days' notice shall be provided by Province to the Debtor, the United States Trustee and the Committee prior to any increases in the rates set forth in the Application, and such notice must be filed with the Court; provided however, the rate increase noted in the Application to occur on January 1, 2026 is hereby approved to occur on January 1, 2026 without further notice. The U.S. 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.

7. The Committee and Province are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

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

EXHIBIT B

Declaration of Paul Navid

**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 PAUL NAVID IN SUPPORT OF APPLICATION FOR
ENTRY OF AN ORDER AUTHORIZING AND APPROVING THE
EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS
EFFECTIVE AS OF DECEMBER 8, 2025**

I, Paul Navid, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and pursuant to Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure and Rule 2014-1 of the Local Rules as follows:

1. I am a Partner with Province, LLC, which is a financial advisory firm with its principal office located at 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074. Province also has offices in the Detroit, Greenwich, Los Angeles, Miami, and New York metro areas. I am authorized to submit this declaration (the “Declaration”) in support of the *Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 8, 2025* (the “Application”).

2. Province, LLC’s corporate structure, including its subsidiaries, is as follows: Province, LLC is a Delaware limited liability company, and Province, LLC’s only two subsidiaries, which are wholly owned, are Province Fiduciary Services, LLC, a Nevada limited

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liability company, and O’Keefe & Associates Consulting, LLC, a Michigan limited liability company (collectively “Province”). All of Province, LLC’s conflicts checks and related disclosures include any connections of Province’s subsidiaries.

3. Neither I, Province, nor any employee 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, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, except as set forth herein.

4. This Declaration is submitted pursuant to sections 328 and 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 Application for the entry of an order approving the retention of Province as financial advisor to the Committee, effective December 8, 2025.

5. In connection with its proposed retention by the Committee in these chapter 11 cases and in preparing this Declaration, Province used a set of procedures developed to ensure compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules regarding the retention of professionals (the “Retention Procedures”). Pursuant to the Retention Procedures, and under my direction and supervision, Province researched its client connections database, which includes all engagements that concluded within the past twenty-four (24) months, to determine whether it has relationships with any of the entities that were identified to Province as creditors or parties-in-interest in these chapter 11 cases (the “Entity List”) a copy which is attached hereto as **Schedule 1**. To the extent such a search indicated that Province has a

relationship with any of the entities on the Entity List, the identities of such entities and Province's relationship with such entities is disclosed in the attached **Schedule 2**.

6. Province sent an email questionnaire to each employee inquiring as to whether each employee or any member(s) of his or her household:

- i. owns any debt or equity securities of the Debtors or their non-debtor affiliates;
- ii. holds a claim against or interest adverse to the Debtors or their non-debtor affiliates;
- iii. is or was an officer, director, or employee of the Debtors or their non-debtor affiliates;
- iv. is related to or has any connections to any Bankruptcy Judge in the United States Bankruptcy Court for the District of Delaware;
- v. is related to or has any connections to anyone working in the Office of the United States Trustee for the District of Delaware;
- vi. was an officer, director or employee of the Debtors within two years prior to the Petition Date; or
- vii. has a connection with a party in interest listed on the Entity List.

7. Province received no employee responses indicating a connection to any of the parties listed on the Entity List.

8. Based on the result of the foregoing searches and employee questionnaire and except as may have been expressly disclosed herein, I have been able to ascertain after diligent inquiry that to the best of my knowledge, Province (i) does not represent any entity having an adverse interest in connection with these chapter 11 cases and (ii) does not represent or hold an interest adverse to the interest of the Debtors or their estates with respect to the matters on which Province is to be employed. Moreover, Province and its subsidiaries are disinterested within the meaning of section 101(14) of the Bankruptcy Code, in that neither I, Province, any Province

subsidiary, nor any of their principals, employees (including those working on this engagement) or associates:

- a. are creditors, equity security holders or insiders of the Debtors;
- b. are or were within two years before the Petition Date, a director, officer or employee of the Debtors;
- c. have an interest materially adverse to the interest of the 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; or
- d. hold any debt or equity securities of the Debtors.

9. As a part of Province's financial advisory practice, Province's clientele includes: debtors, creditors and other statutory committees, institutional creditors, asset purchasers, venture capitalists, secured parties, lessors, contract parties, equity holders, directors and officers, court-appointed fiduciaries, plan sponsors, indenture trustees, and bond insurers. The Debtors have numerous creditors and other parties-in-interest. Province may have in the past represented, and may presently or in the future represent or be deemed adverse to, creditors or parties-in-interest in addition to those specifically disclosed in **Schedule 2** in matters unrelated to these chapter 11 cases. Province believes that its representation of such creditors or other parties in such other matters has not affected and will not affect its representation of the Committee in these proceedings.

10. Except as otherwise set forth herein and in **Schedule 2**, insofar as I have been able to ascertain, the principals, associates and staff members of Province do not have any connection with the Debtors, the Debtors' officers and directors, the Debtors' creditors, the Debtors' equity security holders and other known parties-in-interests or their respective professionals.

11. To the best of my knowledge, information and belief formed after reasonable inquiry, neither I, nor any principal, associate or staff member of Province, insofar as I have been

able to ascertain, is related to the bankruptcy judge assigned to the above-captioned chapter 11 cases.

12. To the best of my knowledge, information and belief formed after reasonable inquiry, neither I, nor any principal, associate or staff member of Province, insofar as I have been able to ascertain, has a connection to the United States Trustee or any person employed in the office of the United States Trustee.

13. Despite the substantial efforts described above to identify and disclose potential conflicts and connections with parties-in-interest in these cases, neither I nor Province is able to conclusively identify all potential relationships or state with absolute certainty that every client representation or other connection of Province has been disclosed. To the extent Province discovers any facts or additional information during the period of Province's retention that requires disclosure, Province will supplement this Declaration to disclose such information.

14. Province has neither received any retainer nor any payment from the Debtors nor the Committee, nor has it received any promise of payment, during the one-year period prior to the filing of the Debtors' petitions. No compensation has been paid or promised to be paid from a source other than the Debtors' estates in these chapter 11 cases. No promises have been received by Province nor by any advisors or attorneys thereof as to compensation in connection with these chapter 11 cases other than in accordance with the provisions of the Bankruptcy Code. Province has no agreement with any other entity to share with such entity any compensation received by Province in connection with these chapter 11 cases, except among employees of Province. Neither the Committee nor its members (or any of their representatives) are or will be liable for fees or costs incurred by Province in its representation of the Committee.

15. Province intends to apply for compensation for professional services rendered in connection with these chapter 11 cases subject to approval of this Court as stated in the Application, and in compliance with applicable provisions of the Bankruptcy Code, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Province.

16. Province's current standard hourly rates are:

<u>Professional Level</u>	<u>Per Hour (USD)</u>
Managing Directors and Partners	\$850-\$1,450
Vice Presidents, Directors, and Senior Directors	\$700-\$1,050
Analysts, Associates, and Senior Associates	\$350-\$825
Paraprofessional / Admin	\$270-\$450

17. Effective as of January 1, 2026, Province is raising its market rates for its services of like kind to the following revised hourly rates, (for which the Application shall serve as notice thereof):

<u>Professional Level</u>	<u>Per Hour (USD)</u>
Managing Directors and Partners	\$900-\$1,600
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Analysts, Associates, and Senior Associates	\$370-\$750
Paraprofessional/Admin /Interns	\$270-\$380

18. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Province intends to provide notice to the Debtors, the Committee, and the U.S. Trustee before implementing any increases in Province's rates for professionals working on these chapter 11 cases.

19. In addition to the fees described above, Province will bill for all out-of-pocket expenses reasonably and actually incurred by Province in connection with the matters contemplated by this Application.

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

Dated: December 23, 2025

By: /s/ Paul Navid
Paul Navid
Partner

Schedule 1

Entity List

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**Identified Connections**

Party	Connection Role
AllState	Adverse Party in Unrelated Closed Case
Chipman Brown Cicero & Cole, LLP	Professionals
DLA Piper	Professionals
FTI Consulting, Inc.	Professionals
Hogan Lovells US LLP	Professionals
Landis Rath & Cobb LLP	Professionals
New York Office of the Attorney General	Client in Unrelated Case
Pachulski Stang Ziehl & Jones LLP	Professionals
Womble Bond Dickinson (US) LLP	Professionals

**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
AND APPROVING THE EMPLOYMENT OF PROVINCE, LLC AS
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EFFECTIVE AS OF DECEMBER 8, 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 and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 8, 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*)
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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 and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 8, 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@gsbbllaw.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 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
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

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