Docket #0017 Date Filed: 1/8/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Hudson 1701/1706, LLC, *et al.*,[1] Debtors.	Chapter 11 Case No. 25-11853 (KBO) (Jointly Administered)
FIRST AMERICAN TITLE INSURANCE COMPANY, solely as Escrow Agent and not in its individual capacity, Plaintiff, v. HUDSON 1701/1706, LLC, HUDSON 1702, LLC, ALBERTO SMEKE SABA, SALOMON SMEKE SABA, CSC HUDSON LLC and PARKVIEW FINANCIAL REIT, LP, Defendants.	Adv. Pro. No. 25-52468 (KBO)

PARKVIEW FINANCIAL REIT, LP'S RESERVATION OF RIGHTS WITH RESPECT TO PLAINTIFF FIRST AMERICAN TITLE INSURANCE COMPANY'S MOTION TO AUTHORIZE DEPOSIT OF INTERPLEADER FUNDS INTO REGISTRY OF COURT AND TO DISCHARGE PLAINTIFF FROM INTERPLEADER ACTION

Defendant Parkview Financial REIT, LP (**"Parkview"**) submits this reservation of rights with respect to Plaintiff First American Title Insurance Company's (**"Plaintiff"**) Motion to Authorize Deposit of Interpleader Funds into the Registry of the Court and to Discharge Plaintiff from the Interpleader Action (the **"Motion"**) [Adv. Pro. Dkt. No. 12].

[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.

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Parkview, as Administrative Agent and Lender under the Settlement Agreement and the Escrow Agreement,[2] hereby reserves all rights and remedies with respect to the Escrow Agreement, the Settlement Agreement, the Complaint for Interpleader [Adv. Pro. Dkt. No. 1], and the related adversary proceeding, including, but not limited to, all rights and remedies against Alberto Smeke Saba, Salomon Smeke Saba, CSC Hudson LLC, the Debtors, and any other person. In addition, although Parkview does not object to Plaintiff's request to deposit the Interpleader Funds with the Registry of the Court, Parkview reserves all rights and remedies with respect to the Proposed Order [Adv. Pro. Dkt. No. 12-1] submitted by Plaintiff insofar as it purports to authorize Plaintiff "to apply the amount of its unpaid fees and expenses to date deducted from the Escrow Funds to its unpaid fees and expenses, as supported by its invoices and/or business records filed in this Interpleader Action." [Adv. Pro. Dkt. No. 12-1 ¶ 3.] Without limiting the foregoing, Parkview reserves all rights and remedies to challenge any unpaid fees and expenses Plaintiff claims in this adversary proceeding or otherwise. Finally, Parkview reserves all rights and remedies with respect to Plaintiff's requests for (i) a discharge and (ii) an injunction against Parkview, and believes that the appropriate time for this Court to consider such requests is after Plaintiff submits its final request for all unpaid fees and expenses.

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[2] The terms **"Administrative Agent"** and **"Lender"** have the definitions set forth in the Settlement Agreement and the Escrow Agreement. Capitalized terms used but not otherwise defined have the meanings given them in the Motion.

Dated: January 8, 2026
Wilmington, DE

PACHULSKI STANG ZIEHL & JONES LLP

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