Docket #0018 Date Filed: 1/9/2026

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. No. 25-52468-KBO **RE: A.D.I. 12, 15**

REPLY TO OBJECTIONS TO PLAINTIFF'S MOTION TO AUTHORIZE DEPOSIT OF INTERPLEADER FUNDS AND RESERVATION OF RIGHTS

Plaintiff First American Title Insurance Company ("First American") hereby files this limited reply(the "Reply") to the *Objection of Alberto Smeke Saba, Salomon Smeke Saba and CSC Hudson LLC 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* [Docket No. 15] filed by Defendants CSC Hudson LLC, Alberto Smeke Saba, and Salomon Smeke Saba (the "Objecting Parties"). Separately, First American will file an expedited request to adjourn the hearing on *Plaintiff's Motion to Authorize Deposit of*

[1] 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).

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Interpleader Funds Into the Registry of the Court and to Discharge Plaintiff from the Interpleader Action [Docket No. 12] (the "Motion") until the hearing on February 12, 2026.

1. First American has reviewed the Objection and the issues raised regarding notice and briefing under the Local Rules. First American was (and remains) prepared to address those concerns by adjourning the hearing until the February 12 hearing date and agree upon a briefing schedule. First American, through counsel, advised the Objecting Parties of same prior to filing this Reply. As the Objecting Parties denied First American's request to adjourn the hearing until the February date to address these concerns, First American files this limited Reply.[2] Separately, First American intends to file an Expedited Request to Adjourn the Hearing and incorporates those forthcoming arguments herein.

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[2] First American reserves the right to address other and further arguments raised in the Objection up to and at the time of hearing thereon.

Dated: January 9, 2026

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

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