IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Hudson 1701/1706 LLC, Debtors.[1]	Chapter 11 Case No. 25-11853 (KBO) (Jointly Administered)
HUDSON 1701/1706, LLC, a Delaware limited liability company; and HUDSON 1702, LLC, a Delaware limited liability company, Plaintiffs, v. 356W58 GROUND LESSOR LLC, a Delaware limited liability company, Defendant.	Adv. Proc. No. 25-52471 (KBO)

356W58 GROUND LESSOR LLC'S MOTION TO DISMISS THE COMPLAINT

356W58 Ground Lessor LLC ("356W58"), by and through its undersigned counsel, and pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, made applicable to this adversary proceeding pursuant to Rule 7012 of the Federal Rules of Bankruptcy Procedure, hereby submits this motion to dismiss the complaint ("Motion") [D.I. 8] filed by Debtors.[2]

[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' headquarters and the mailing address for the Debtors is 11440 San Vicente Boulevard, 2nd Floor, Los Angeles, CA 90045.

[2] Pursuant to Del. Bankr. L.R. 7012-1, 356W58 consents to the entry of a final order or judgment solely as it relates to the relief sought in this Motion to the extent the Court, absent consent of the parties, cannot enter final orders or judgment consistent with Article III of the United States Constitution.

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WHEREFORE, 356W58 respectfully requests that the Court (i) enter the Proposed Order, dismissing the Complaint in its entirety, and (ii) grant such other and further relief as is just and proper.

Dated: February 4, 2026
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew B. McGuire
Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Katherine S. Dute (No. 6788)
Soumya P. Venkateswaran (No. 7278)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
Email: landis@lrclaw.com
mcguire@lrclaw.com
dute@lrclaw.com
venkateswaran@lrclaw.com

– and –

ADLER & STACHENFELD LLP
Kirk L. Brett (admitted *pro hac vice*)
Patrick O'Connor (admitted *pro hac vice*)
555 Madison Avenue, 6th floor
New York, New York 10022
Telephone: (212)883-1700
Facsimile: (212)883-8883
Email: kbrett@adstach.com
poconnor@adstach.com

Counsel to 356W58 Ground Lessor LLC

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
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HUDSON 1701/1706, LLC, a Delaware limited liability company; and HUDSON 1702, LLC, a Delaware limited liability company, Plaintiffs, v. 356W58 GROUND LESSOR LLC, a Delaware limited liability company, Defendant.	Adv. Proc. No. 25-52471 **Ref. No. ____**

ORDER GRANTING 356W58 GROUND LESSOR LLC'S
MOTION TO DISMISS THE COMPLAINT

Upon consideration of the motion of 356W58 Ground Lessor LLC ("356W58") to dismiss the complaint (the "Motion")[2]; and the Court having considered the Motion and any opposition thereto; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, and their creditors; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding; and the filing of the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that

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[2] Capitalized terms used but not defined herein shall have the meanings given to them in the Motion.

356W58's notice of the Motion and opportunity for a hearing were appropriate under the circumstances and that no other notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion establish cause for the relief granted herein; and upon all of the proceedings had before this Court, and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. All objections to the Motion are overruled.

3. The Complaint is dismissed effective as of the date of the entry of this Order.

4. Notwithstanding the applicability of any Bankruptcy Rules to the contrary, the terms and conditions of this Order shall be effective and enforceable immediately upon entry of this Order.

5. This Court retains jurisdiction with respect to all matters arising from or related to implementation of this Order.