Docket #0035 Date Filed: 2/19/2026

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)
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)

NOTICE OF COMPLETION OF BRIEFING AND REQUEST FOR ORAL ARGUMENT REGARDING DEFENDANT'S MOTION TO DISMISS THE PLAINTIFFS' COMPLAINT

PLEASE TAKE NOTICE that 356W58 Ground Lessor LLC (the "Defendant"), by and through its undersigned counsel, hereby gives notice, pursuant to Rule 7007-4 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, that briefing concerning the Defendant's Motion to Dismiss the Complaint [Adv. Docket No. 15] (the "Motion to Dismiss") is now complete and ready for disposition by the Court.

[1] Debtors in these Chapter 11 cases, along with the last four digits of each [illegible] are: Hudson 1701/1706, LLC (0281) and Hudson 1702, LLC (0190).

2511853260223000000000010

PLEASE TAKE FURTHER NOTICE that the relevant pleadings are as follows:

TAB NO.	PLEADINGS
A.	Complaint [Adv. Docket No. 1, December 22, 2025].
B.	356W58 Ground Lessor LLC's Motion to Dismiss the Complaint [Adv. Docket No. 15, filed February 4, 2026].
C.	356W58 Ground Lessor LLC's Memorandum of Law in Support of Its Motion to Dismiss the Complaint [Adv. Docket No. 16, filed February 4, 2026].
D.	Declaration of Matthew B. McGuire in Support of 356W58 Ground Lessor LLC's Motion to Dismiss the Complaint [Adv. Docket No. 17, filed February 4, 2026].
E.	The Debtors' Opposition to Defendant's Motion to Dismiss [Adv. Docket No. 25, filed February 11, 2026].
F.	356W58 Ground Lessor LLC's Reply Memorandum of Law in Further Support of Its Motion to Dismiss the Complaint [Adv. Docket No. 32, filed February 18, 2026].

The Defendant hereby requests that this Court hear oral argument in connection with these pleadings at a hearing to be scheduled at the convenience of the Court.

[*Signature Page to Follow*]

Dated: February 19, 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

CERTIFICATE OF SERVICE

I, Matthew B. McGuire, hereby certify that, on February 19, 2026, the *Notice of Completion of Briefing and Request for Oral Argument Regarding Defendant's Motion to Dismiss the Plaintiffs' Complaint* (the "Notice") was filed via the Court's CM/ECF electronic filing system, which sent notice to all parties receiving notification through CM/ECF.

I further certify that, in addition, on the same day, I caused the Notice to be served on the following parties listed via electronic mail.

/s/ Matthew B. McGuire
Matthew B. McGuire (No. 4366)

SERVICE LIST VIA ELECTRONIC MAIL

CHIPMAN BROWN CICERO & COLE, LLP William E. Chipman, Jr., Esq. Mark D. Olivere, Esq. Aaron J. Bach, Esq. Alison R. Maser, Esq. Hercules Plaza 1313 North Market Street, Suite 5400 Wilmington, Delaware 19801 Email: chipman@chipmanbrown.com olivere@chipmanbrown.com bach@chipmanbrown.com maser@chipmanbrown.com	**BOIES SCHILLER FLEXNER LLP** Robert Gordon, Esq. Michael M. Fay, Esq. Jenny H. Kim, Esq. Jeffrey Waldron, Esq. Katherine Zhang, Esq. 55 Hudson Yards New York, New York 10001 Email: rgordon@bsfllp.com mfay@bsfllp.com jkim@bsfllp.com jwalrdon@bsfllp.com kzhang@bsfllp.com