Docket #0055 Date Filed: 3/20/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Hudson 1701/1706, LLC, *et al.*,[1] Debtor.	Chapter 11 Case No. 25-11853 (KBO) (Jointly Administered)
HUDSON 1701/1706, LLC, Plaintiff, v. 356W58 Ground Lessor LLC, Defendant.	 Adv. Pro. No. 25-52471 (KBO) **Related Docket No. 34**

CERTIFICATION OF COUNSEL REGARDING
PROPOSED AMENDED SCHEDULING ORDER

The undersigned hereby certifies as follows:

1. On December 22, 2025, Plaintiffs Hudson 1701/1706, LLC and Hudson 1702, (together, the "**Plaintiffs**") commenced the above-captioned adversary proceeding (the "**Action**") by filing a complaint against defendant 356W58 Ground Lessor LLC (the "**Defendant**" and together with the Plaintiffs, the "**Parties**").

2. On February 19, 2026, the Court entered the operative scheduling order (the "**Scheduling Order**") in this Action. *See* ECF 34.

[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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3. The Parties have jointly agreed to amend the Scheduling Order in the form attached hereto as Exhibit A (the "**Proposed Amended Scheduling Order**") to allow sufficient time to complete the production of documents, the depositions of fact witnesses, and expert discovery.

4. To accommodate the proposed deadline for the completion of expert discovery, the Proposed Amended Scheduling Order reschedules the Final Pretrial Conference for May 15, 2026 at 11:30 a.m. (Eastern), which date was previously obtained from the Court.

5. The Proposed Amended Scheduling Order sets the deadline for the submission of motions *in limine* and the joint pretrial order for May 13, 2026, the day after expert discovery is set to close under the Proposed Amended Scheduling Order.

6. Plaintiffs and Defendant respectfully request the Court enter the Proposed Amended Scheduling Order at its earliest convenience.

[*Signature Page to Follow*]

Dated: March 20, 2026
Wilmington, Delaware

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Counsel for Debtors and Debtors in Possession

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Hudson 1701/1706, LLC, *et al.*,[1] Debtor.	Chapter 11 Case No. 25-11853 (KBO) (Jointly Administered)
HUDSON 1701/1706, LLC, Plaintiff, v. 356W58 Ground Lessor LLC, Defendant.	 Adv. Pro. No. 25-52471 (KBO)

AMENDED SCHEDULING ORDER

To promote the efficient and expeditious disposition of the above-captioned adversary proceeding, the following schedule shall apply. It is hereby ORDERED that:

1. The requirements of Fed. R. Civ. P. 26(f) and Fed. R. Bankr. P. 7026 (e.g., mandatory meeting before scheduling conference/discovery plan) are deemed satisfied. The parties are not required to file a discovery plan as contemplated by Fed. R. Civ. P. 26(f)(3).

2. Initial Disclosures and Document Requests. The parties shall provide their initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1), and any Document Requests, on or before **February 20, 2026**.

[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.

3. Discovery.

a. The parties shall conduct discovery consistent with the applicable Federal Rules of Civil Procedure, Federal Rules of Bankruptcy Procedure, and Local Rules of the United States Bankruptcy Court for the District of Delaware.

b. Each party may be served with no more than twenty (20) interrogatories, including contention interrogatories, unless otherwise agreed to by the parties or ordered by the Court for good cause shown. Interrogatories shall be served by **February 27, 2026.**

c. If the parties agree or the Court orders, a deposition of a party or a non-party may be conducted remotely by video via Zoom or similar technology.

d. The parties shall be required to log privileged communications.

e. The parties shall make a first production of documents no later than **March 20, 2026**, with rolling productions of documents continuing thereafter.

f. Production of documents shall be substantially completed by **April 3, 2026.**

g. All formal fact discovery shall be completed by no later than **May1, 2026**.

h. Expert disclosures pursuant to Fed.R.Civ.P. 26(a)(2) shall be served by **April 17, 2026**.

i. Expert rebuttal reports, if any, shall be served by **May 1, 2026**.

j. All expert discovery shall be completed, and all discovery shall close, by **May 12, 2026**.

4. Motions to Join or Amend. All motions to join other parties and to amend or supplement the pleadings shall be filed on or before **February 20, 2026**.

5. Dispositive Motions. The parties agree that dispositive motions shall not be permitted.

6. Witnesses and Exhibits. By no later than 4 p.m. (Eastern) two (2) days prior to the date of the Final Pretrial Conference, each party shall serve the following:

a. Their list of trial witnesses, who shall be listed in the order they will be called along with a brief statement of the evidence the witness will give. Witnesses shall be classified between those who any party expects to present and those whom any party may call if the need arises. If not already provided to all parties, the address and telephone number of each witness shall be disclosed.

b. Their list of exhibits to be offered into evidence at trial, together with a hard copy of all such exhibits which shall be serially numbered and physically marked before trial (e.g., "Hudson's Ex. 1" or "Defendants' Ex. 1"); and

c. Any discovery item or trial deposition to be offered into evidence at trial. Counsel shall designate by page portion of deposition testimony and by number the interrogatories which shall be offered in evidence at trial.

7. Motions in Limine. Any motions in limine shall be filed by no later than 4 p.m. (Eastern) two (2) days prior to the date of the Final Pretrial Conference.

8. Joint Pretrial Order. By no later than 4:00 p.m. (Eastern) two (2) days prior to the date of the Final Pretrial Conference, the parties shall file a Joint Pretrial Order. Among other things, the Joint Pretrial Order should contain the following as to each party:

a. Basis of jurisdiction (including a statement whether this matter is core or noncore). If the matter is noncore, the parties shall state whether they consent to the Court's entry of a final order pursuant to 28 U.S.C. § 157(c)(2). If the parties disagree, they shall each cite to relevant authority to support their positions.

b. Statement of uncontested facts;

c. Statement of facts which are in dispute. No facts should be disputed unless opposing counsel expects to present contrary evidence on the point of trial, or genuinely challenges the fact on credibility grounds;

d. Statement of damages claimed or relief sought;

e. Legal issues presented and the authorities relied upon, as well as which party has the burden of proof.

f. Witnesses listed in the order they will be called;

g. A list of all exhibits to be offered into evidence; and

h. A list of each discovery item and trial deposition to be offered into evidence.

9. Final Pretrial Conference. The Final Pretrial Conference will be held on **May 15, 2026 at 11:30 a.m. (Eastern).**

10. Trial Exhibits. At least three (3) days prior to the start of trial, each party shall deliver to the Court sufficient copies of all pre-marked exhibits assembled in binders and appropriately tabbed or otherwise identified, so the Court, the clerk, the witness, and all counsel will have a copy.

11. Trial. Trial of this adversary proceeding will begin on **May 19, 2026 at 9:30 a.m. (Eastern)** and continue on **May 21, 2026 at 9:30 a.m. (Eastern)** and **May 22, 2026 at 9:30 a.m. (Eastern)** at the United States Bankruptcy Court for the District of Delaware, 824 N. Market St., 6th Floor, Courtroom #3, Wilmington, Delaware 19801.

12. Parties must be prepared to proceed to trial on the scheduled date. Adjournments will be granted only for compelling reasons beyond the control of the parties.

13. Deadlines contained in this Order may be extended upon agreement of the parties or by further order of the Court.