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: D.I. 77**

CERTIFICATION OF NO OBJECTION REGARDING FIRST AMERICAN'S MOTION TO RECOVER ITS REASONABLE ATTORNEYS' FEES AND EXPENSES

The undersigned hereby certifies that, as of the date hereof, no objection has been received to *First American's Motion to Recover Its Reasonable Attorneys' Fees and Expenses* (the "Motion") [Adversary Proceeding Docket No. 77] filed on April 9, 2026.[2] The undersigned further certifies that the Court's docket has been reviewed in this case, and only one responsive pleading to the Motion was filed: *Parkview Financial REIT, LP's Reservation of Rights with*

[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).

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

Respect to First American's Motion to Recover Its Reasonable Attorneys' Fees and Expenses [Adversary Proceeding Docket No. 81] (the "Parkview Reservation of Rights"). The Parkview Reservation of Rights states, in relevant part, that "Parkview does not object to the relief requested in the Motion." *Id.* at 2. Out of an abundance of caution, the undersigned reached out to counsel for Parkview who confirmed that Parkview does not object to the Motion.

Pursuant to Del. Bankr. L. R. 7007-1(a)(ii), objections to the Motion were to be filed and served no later than April 23, 2026.

Accordingly, it is respectfully requested that the Court grant the relief requested in the Motion and that the Proposed Order attached to the Motion as **Exhibit A** [Adversary Proceeding Docket No. 77-1] be entered at the Court's convenience.

[*Signature Page to Follow*]

Dated: April 24, 2026

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

/s/ *Jennifer R. Hoover*

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