Docket #0098 Date Filed: 7/31/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: HUDSON 1701/1706, LLC, *et al.*,[1] Debtors.	Chapter 11 Case Nos. 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)

CERTIFICATION OF COUNSEL REGARDING
STIPULATED SCHEDULE RE: MOTION TO DISMISS

1. The undersigned hereby certifies that the above-captioned debtors and debtors-in-possession (the "**Debtors**") and 356W58 Ground Lessor LLC ("**Ground Lessor**") have entered into a stipulation (the "**Stipulation**") that, subject to approval of the Court, agrees on a schedule

[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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with regard to *356W58 Ground Lessor LLC's Motion to Dismiss the Amended Complaint* [Docket No. 93] (the "**Motion to Dismiss**").

2. A copy of the Stipulation is attached as Exhibit A to the proposed order annexed hereto as Exhibit 1 (the "**Proposed Order**").

WHEREFORE, the Debtors and Ground Lessor respectfully request that the Court enter the Proposed Order at its earliest convenience.

Date: July 31, 2026
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

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Counsel for Debtors and Debtors in Possession

EXHIBIT 1

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: HUDSON 1701/1706, LLC, *et al.*,[1] Debtors.	Chapter 11 Case Nos. 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 Re: Docket No. ____

ORDER APPROVING STIPULATED SCHEDULE RE: MOTION TO DISMISS

Upon the Certification of Counsel filed by the Debtors, and the Stipulation attached hereto as Exhibit A (the "**Stipulation**") regarding *356W58 Ground Lessor LLC's Motion to Dismiss the Amended Complaint* [Docket No. 93] (the "**Motion to Dismiss**"); and good and sufficient cause appearing therefor;

[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.

IT IS HEREBY ORDERED THAT:

1. The Stipulation is hereby APPROVED as set forth herein.

2. The schedule for the Motion to Dismiss shall be as follows:

SCHEDULE

Deadline for Ground Lessor to file Motion to Dismiss	July 9, 2026
Deadline for Debtors to file Opposition to Motion to Dismiss	July 30, 2026
Deadline for Ground Lessor to file Reply in further support of Motion to Dismiss	August 13, 2026
Oral Argument	September 9, 2026

3. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: HUDSON 1701/1706, LLC, *et al.*,[1] Debtors.	Chapter 11 Case Nos. 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)

STIPULATED SCHEDULE RE:
356W58 GROUND LESSOR LLC'S MOTION TO DISMISS
THE AMENDED COMPLAINT [DOCKET NO. 93]

The above-captioned debtors and debtors-in-possession (the "**Debtors**") and 356W58 Ground Lessor LLC ("**Ground Lessor**") (collectively, the "**Parties**") hereby stipulate and agree that the schedule set forth herein shall govern with regard to *356W58 Ground Lessor LLC's Motion to Dismiss the Amended Complaint* [Docket No. 93] (the "**Motion to Dismiss**"), absent further Order of the Court or the agreement of the Parties:

[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.

SCHEDULE

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Oral Argument	September 9, 2026

Except as specifically set forth herein, all rights, claims and defenses of the Parties are hereby fully preserved.

[Signature Page to Follow]

IT IS SO STIPULATED.

Dated: July 30, 2026

Respectfully submitted,

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