

**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)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to sections 342 and 1109(b) of title 11 of the United States Code (as amended and applicable to the above-captioned bankruptcy case, the “Bankruptcy Code”), 11 U.S.C. § 101-1532, Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2002-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, Dentons US LLP and Benesch, Friedlander, Coplan & Aronoff LLP hereby appear as counsel to First American Title Insurance Company, solely as Escrow Agent and not in its individual capacity (the “Escrow Agent”), in the above-captioned bankruptcy case (the “Bankruptcy Case”).

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rules 2002, 3017, and 9007, the undersigned requests that copies of all notices, pleadings, and all other papers required to be served in the Bankruptcy Case be served upon the following persons, and that such persons be added to the mailing matrix in the Bankruptcy Case:

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).



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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code sections 342 and 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules set forth above, but also includes, without limitation, any orders and notices of any application, complaint, demand, motion, petition, pleading, disclosure statement or plan of reorganization, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, overnight, or hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the Bankruptcy Case and proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, filing, claim, or suit is not intended nor shall be deemed to waive the rights of the Escrow Agent to: (1) have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a de novo review by a district court judge; (3) trial by jury in any case, proceeding, matter, or controversy so triable; (4) have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; (5) maintain any objection to the jurisdiction

and/or venue of the Bankruptcy Court or any other court for any purpose; or (6) assert any other rights, claims, actions, defenses, setoffs, or recoupments to which the Escrow Agent is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: December 31, 2025
Wilmington, Delaware

**BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP**

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-and-

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CERTIFICATE OF SERVICE

I, Jennifer R. Hoover, hereby certify that on December 31, 2025, a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Papers* was served upon all parties of record via CM/ECF.

/s/ Jennifer R. Hoover
Jennifer R. Hoover (DE #5111)