IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Hudson 1701/1706, LLC, *et al.*,[1]	Case No. 25-11853 (KBO)
	(Jointly Administered)
Debtors.	**Related to Docket No. 659**

MOTION TO SHORTEN TIME FOR NOTICE AND RESPONSE TO DEBTORS' MOTION FOR AUTHORITY TO ENTER INTO PRECONSTRUCTION SERVICES AGREEMENT PURSUANT TO 11 U.S.C. § 363(b)

The above-captioned debtors and debtors in possession (collectively the "**Debtors**" or "**Company**"), file this motion (the "**Motion to Shorten**") for entry of an order shortening time for notice and responses to the *Debtors' Motion for Authority to Enter into Preconstruction Services Agreement* (the "**Services Motion**")[2], and, in support hereof, states as follows:

JURISDICTION

1. The United States Bankruptcy Court for the District of Delaware (the "**Court**") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

2. The Debtors confirm their consent, pursuant to Rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**"), to the entry of a final order by the Court in connection with this Motion to Shorten to the extent that it

[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.

[2] Capitalized terms used but not defined herein have the meanings ascribed to such terms in the Services Motion.

is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are section 105(a) of title 11 of the United States Code (the "**Bankruptcy Code**"), Rules 2002(a)(2) and 9006(c) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and Local Rule 9006-1(e).

BACKGROUND

5. The Debtors hereby incorporate by reference the factual background set forth in the Services Motion, filed contemporaneously herewith.

RELIEF REQUESTED

6. By this Motion to Shorten, the Debtors respectfully request that the Court enter an order (i) shortening notice so the Services Motion may be heard at the September 15, 2026 hearing (or, alternatively, the September 9th hearing, to the extent nothing is going forward at the September 15th hearing and the Court would prefer to consolidate the hearings); (ii) directing that any objections to the relief sought in the Services Motion be filed and served upon the Debtors so as to be received no later than 4:00 p.m. the day before the hearing; and (iii) granting such other and further relief to the Debtors as the Court deems appropriate.

BASIS FOR RELIEF REQUESTED

7. Bankruptcy Rule 2002 requires at least 21 days' notice to creditors when property of the estate is used, sold, or leased, other than in the ordinary course of business, unless the court for cause, shortens notice. Fed. R. Bankr. P. 2002(a)(2). However, Local Rule 9006-1(e) allows a party to request shortened notice for a hearing upon written request specifying the exigencies supporting the requested relief. *See id.* 9006-1(e).

8. The Debtors respectfully submit that the exigencies in this matter amply justify expedited consideration of the Services Motion.

9. As stated in the Services Motion, the Debtors' entry into the Preconstruction Services Agreement (the "**PSA**") with the Development Manager is critical to facilitating Development Manager's conducting of due diligence and potentially formulating a Project completion plan that will provide the basis for a plan of reorganization. Time is of the essence in this endeavor, and the sooner the Development Manager can begin to render services and conduct analyses and discussions pursuant to the PSA, the sooner the Chapter 11 Cases may be advanced and reach completion, to the benefit of all stakeholders.

10. The Debtors further request that any objections to the relief requested in the Services Motion be filed by 4:00 p.m. the day before the hearing.

11. The parties set forth in the notice section to the Services Motion will be served with the order approving this Motion to Shorten and the Services Motion via email, facsimile, or mail the day of any such order being entered. Accordingly, interested parties will have sufficient notice of the Services Motion.

STATEMENT PURSUANT TO LOCAL RULE 9006-1(e)

12. In accordance with Local Rule 9006-1(e), counsel to the Debtors contacted the Office of the United States Trustee for the District of Delaware (the "**U.S. Trustee**"), counsel for the Official Committee of Unsecured Creditors (the "**Committee**"), and counsel for the Debtors' DIP Lender. The Debtors have spoken to the U.S. Trustee and counsel for the Committee, who have both indicated that they will review the Services Motion but have not yet taken a position with respect to the relief requested herein, and the Debtors' DIP Lender does not object to the relief requested herein.

WHEREFORE, for the reasons stated herein, the Debtors respectfully request that the Court grant the relief requested in this Motion to Shorten, enter the Proposed Order in the form attached hereto, and grant such other and further relief as the Court deems just and proper.

Dated: September 3, 2026
Wilmington, Delaware

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EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Hudson 1701/1706, LLC, *et al.*,[1]	Case No. 25-11853 (KBO)
	(Jointly Administered)
Debtors.	**Related to Docket No.**

ORDER GRANTING MOTION TO SHORTEN TIME FOR NOTICE AND RESPONSE TO THE DEBTORS' MOTION FOR AUTHORITY TO ENTER INTO PRECONSTRUCTION SERVICES AGREEMENT

Upon the motion (the "**Motion to Shorten**")[2] of the above-captioned Debtors, seeking the entry of an order pursuant to Bankruptcy Code sections 105(a) and 363(b), Bankruptcy Rules 2002 and 9006(c)(1), and Local Rule 9006-1(e), among other things, shortening time for notice and responses to and scheduling a hearing on the *Debtors' Motion for Authority to Enter into Preconstruction Services Agreement* (the "**Services Motion**"); and the Court having determined that the relief requested in the Motion to Shorten is appropriate, and upon the record herein, and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion to Shorten is GRANTED as set forth herein;

2. A hearing on the relief requested in the Services Motion shall be held on September __, 2026, at _____ a.m. (prevailing Eastern Time).

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[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.

[2] Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Motion to Shorten.

3. Any objection or response to the Debtors' request for relief in the Services Motion shall be filed and served so as to be received by the Debtors no later than September __, 2026 at 4:00 p.m. (ET).

4. The Court shall retain jurisdiction to hear and determine all disputes arising out of or related to this Order.