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) **Hearing Date: September 15, 2026, at 10:30 a.m. (ET)** **Obj. Deadline: September 14, 2026, at 4:00 p.m. (ET)**

NOTICE OF THE DEBTORS' MOTION PURSUANT TO 11 U.S.C. § 363(b) FOR AUTHORITY TO ENTER INTO PRECONSTRUCTION SERVICES AGREEMENT

PLEASE TAKE NOTICE that on September 3, 2026, the above-captioned debtors and debtors-in-possession (the "**Debtors**") filed the *Debtors' Motion Pursuant to 11 U.S.C. § 363(b) for Authority to Enter into Preconstruction Services Agreement* [D.I. 659] (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

PLEASE TAKE FURTHER NOTICE that on September 3, 2026, the Debtors also filed the *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)* [D.I. 660] (the "**Motion to Shorten"**) with the Court.

PLEASE TAKE FURTHER NOTICE that on September 4, 2026, the Court entered an order [D.I. 665] granting the Motion to Shorten (the "**Shortening Order"**).

PLEASE TAKE FURTHER NOTICE pursuant to the Shortening Order, responses, if any, to the Motion must be filed on or before **September 14, 2026, at 4:00 p.m. (Eastern Time)** (the "**Objection Deadline**") with the Court, 824 North Market Street, Third Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that at the same time, you must serve a copy of the response on (a) co-counsel to the Debtors, Chipman Brown Cicero & Cole LLP, 1313 N. Market Street, Suite 5400, Wilmington, DE 19801 (Attn: William E. Chipman, Jr. and Mark D. Olivere; [chipman@chipmanbrown.com] and [olivere@chipmanbrown.com]); (b) co-counsel to the Debtors, Boies Schiller Flexner LLP, 55 Hudson Yards, 20th Floor, New York, NY 10001 (Attn: Robert D. Gordon and Michael M. Fay; [rgordon@bsfllp.com] and [mfay@bsfllp.com]); and (c) the Office of the United States Trustee for Region 3, J. Caleb Boggs Federal Building, 844 King Street, Lockbox 35, Wilmington, Delaware 19801 (Attn: Jane M. Leamy[jane.m.leamy@usdoj.gov]), so as to be received on or before the Objection Deadline.

[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.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **September 15, 2026, at 10:30 a.m. (Eastern Time)** before the Honorable Karen B. Owens in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Sixth Floor, Court Room 3, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: September 4, 2026

CHIPMAN BROWN CICERO & COLE LLP

/s/ William E. Chipman , Jr.

William E. Chipman, Jr. (No. 3818)
Mark D. Olivere (No. 4291)
Aaron J. Bach (No. 7364)
Alison R. Maser (No. 7430)
1313 North Market Street, Suite 5400
Wilmington, Delaware 19801
Telephone: (302) 295-0191
Email: chipman@chipmanbrown.com
olivere@chipmanbrown.com
bach@chipmanbrown.com
maser@chipmanbrown.com

-and-

BOIES SCHILLER & FLEXNER LLP

Robert D. Gordon, Esq. (admitted *pro hac vice*)
Michael M. Fay. Esq. (admitted *pro hac vice*)
Jenny H. Kim, Esq. (admitted *pro hac vice)*
Jeffrey Waldron, Esq. (admitted *pro hac vice*)
Katherine Zhang, Esq. (admitted *pro hac vice*)
55 Hudson Yards, 20th Floor,
New York, New York 10001
Telephone: (212) 446-2300
Email: rgordon@bsfllp.com
mfay@bsfllp.com
jkim@bsfllp.com
jwaldron@bsfllp.com
kzhang@bsfllp.com

Counsel to the Debtors and Debtors in Possession