IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Hudson 1701/1706 LLC,	Case No. 25-11853 (KBO)
Debtors.[1]	(Jointly Administered)
	Hearing Date: September 9, 2026 at 9:30 a.m. (ET) **Objection Deadline: Prior to or at the Hearing**

356W58 GROUND LESSOR LLC'S MOTION TO FILE UNDER SEAL DECLARATION OF MATTHEW B. MCGUIRE IN SUPPORT OF 356W58 GROUND LESSOR LLC'S RENT MOTION PRE-HEARING BRIEF

356W58 Ground Lessor LLC ("Landlord"), by its undersigned counsel, hereby files this motion (this "Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), pursuant to sections 105(a) and 107(b) of title 11 of the United States Code (the "Bankruptcy Code"), rule 9018 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rule 9018-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), authorizing Landlord to file under seal the *Declaration of Matthew B. McGuire in Support of 356W58 Ground Lessor LLC's Rent Motion Pre-Hearing Brief* [D.I. 663] (the "McGuire Declaration"). In support of this Motion, Landlord respectfully states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (this "Court") has jurisdiction to consider this Motion under 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 as of

[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' headquarters and the mailing address for the Debtors is 11440 San Vicente Boulevard, 2nd Floor, Los Angeles, CA 90045.

February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b). Venue of this case and the Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

2. Pursuant to Local Rule 9013-1(f), Landlord hereby consents to the entry of a final order in connection with the Motion if it is determined that this Court cannot, absent the consent of the parties, enter such final order consistent with Article III of the United States Constitution.

3. The statutory predicates for the relief requested herein are Bankruptcy Code sections 105(a) and 107(b), Bankruptcy Rule 9018, and Local Rule 9018-1.

BACKGROUND

4. On October 22, 2025 (the "Petition Date"), the above-captioned debtors and debtors-in-possession (the "Debtors") each filed a voluntary petition for relief under title 11 of the Bankruptcy Code.

5. On September 4, 2026, Landlord filed *356W58 Ground Lessor LLC's Rent Motion Pre-Hearing Brief* [D.I. 662] (the "Pre-Hearing Brief") along with the McGuire Declaration. The McGuire Declaration includes certain non-public information and materials.

6. A hearing on the Pre-Hearing Brief and McGuire Declaration, among other matters, is set for September 9, 2026.

RELIEF REQUESTED

7. By this Motion, pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1, Landlord respectfully requests entry of the Proposed Order, authorizing Landlord to file the McGuire Declaration under seal.

BASIS FOR RELIEF

8. Section 107(b)(1) of the Bankruptcy Code provides:

> (b) On request of a party in interest, the bankruptcy court shall, and on the bankruptcy court's own motion, the bankruptcy court may—

> (1) protect an entity with respect to a trade secret or confidential research, development, or commercial information . . .

11 U.S.C. § 107(b)(1). *See also In re Orion Pictures Corp.*, 21 F.3d 24, 27 (2d Cir. 1994) ("[I]f the information fits any of the specified categories, the court is *required* to protect a requesting interested party and has no discretion to deny the application.").

9. In addition, under Bankruptcy Code section 105(a), the Court may "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions" of the Bankruptcy Code. 11 U.S.C. § 105(a).

10. Bankruptcy Rule 9018 sets forth the procedures by which a party may move for relief under section 107(b) of the Bankruptcy Code, providing that "[o]n motion or on its own, the court may . . . issue any order that justice requires to . . . protect the estate or any entity regarding a trade secret or other confidential research, development, or commercial information[.]" Fed. R. Bankr. P. 9018(a)(1). Local Rule 9018-1(d) requires that a party seeking to file documents under seal file a motion requesting such relief. *See* Del. Bankr. L.R. 9018-1(d).

11. Unlike its counterpart in rule 26(c) of the Federal Rules of Civil Procedure, section 107(b) of the Bankruptcy Code does not require an entity seeking protection thereunder to demonstrate "good cause." *See Orion Pictures*, 21 F.3d at 27–28. Instead, the moving party need only demonstrate that the material sought to be protected satisfies one of the categories identified in section 107(b) of the Bankruptcy Code. *See id.*; *see also In re Altegrity, Inc.*, No. 15-10226 (LSS), 2015 WL 10963572, at *3 (Bankr. D. Del. July 6, 2015) ("[I]f it is established that the documents sought to be sealed fall within the enumerated statutory exception, the Court must grant the requested relief (or such other relief that protects the moving party).").

12. Landlord files this Motion to maintain the confidentiality of certain commercially sensitive information. The McGuire Declaration and associated exhibits contain information and

other materials that are not publicly available and qualifies as confidential, commercial information that must be protected from public disclosure pursuant to Bankruptcy Code section 107(b) (the "Confidential Information"). Therefore, due to the sensitive, confidential and commercial nature of the Confidential Information, Landlord submits that a portion of the McGuire Declaration or associated exhibits fall within the scope of Bankruptcy Code section 107(b), good cause exists for the Court to grant the relief requested herein, and approval of this Motion is appropriate.

COMPLIANCE WITH LOCAL RULE 9018-1(d)

13. To the best of the knowledge, information, and belief of the undersigned counsel to Landlord, the McGuire Declaration contains information that is protected by Bankruptcy Code section 107(b). Pursuant to Local Rule 9018-1(d), counsel to Landlord contacted counsel to the Debtors with respect to the scope of redactions, and the Debtors do not oppose the redactions or suggest any further modifications.

14. Contemporaneously herewith, Landlord has filed the proposed redacted McGuire Declaration on the public docket.

NOTICE

15. Notice of this Motion will be given to the following or in lieu thereof, their counsel, if known: (a) the United States Trustee for the District of Delaware; (b) the Debtors; (c) Parkview Financial REIT, LP; (d) the Official Committee of Unsecured Creditors; and (e) any party that has requested notice pursuant to Bankruptcy Rule 2002. Landlord submits that, under the circumstances, no other or further notice is required.

Dated: September 4, 2026
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Soumya P. Venkateswaran

Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Katherine S. Dute (No. 6788)
Soumya P. Venkateswaran (No. 7278)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
Email: landis@lrclaw.com
mcguire@lrclaw.com
dute@lrclaw.com
venkateswaran@lrclaw.com

– and –

ADLER & STACHENFELD LLP

Kirk L. Brett (admitted *pro hac vice*)
Patrick O'Connor (admitted *pro hac vice*)
555 Madison Avenue, 6th floor
New York, New York 10022
Telephone: (212)883-1700
Facsimile: (212)883-8883
Email: kbrett@adstach.com
poconnor@adstach.com

Counsel to 356W58 Ground Lessor LLC

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Hudson 1701/1706 LLC,	Case No. 25-11853 (KBO)
Debtors.[1]	(Jointly Administered)
	Re: ___

ORDER GRANTING 356W58 GROUND LESSOR LLC'S MOTION TO FILE UNDER SEAL DECLARATION OF MATTHEW B. MCGUIRE IN SUPPORT OF 356W58 GROUND LESSOR LLC'S RENT MOTION PRE-HEARING BRIEF

Upon *356W58 Ground Lessor LLC's Motion to File Under Seal Declaration of Matthew B. McGuire in Support of 356W58 Ground Lessor LLC's Rent Motion Pre-Hearing Brief* (the "Motion");[2] and the Court having jurisdiction over this matter; and it appearing that sufficient notice of the Motion has been given under the circumstances; and it appearing that the relief requested by the Motion is necessary and appropriate; and sufficient cause appearing therefor;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is **GRANTED**.

2. Pursuant to Bankruptcy Code Section 107(b), Bankruptcy Rule 9018, Local Rule 9018-1, Landlord is authorized to file the Confidential Information under seal.

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

[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' headquarters and the mailing address for the Debtors is 11440 San Vicente Boulevard, 2nd Floor, Los Angeles, CA 90045.

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

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Hudson 1701/1706 LLC,	Case No. 25-11853 (KBO)
Debtors.[1]	(Jointly Administered)
	Hearing Date: September 9, 2026 at 9:30 a.m. (ET) **Objection Deadline: Prior to or at the Hearing**

NOTICE OF MOTION

TO: (a) the United States Trustee for the District of Delaware; (b) the Debtors; (c) Parkview Financial REIT, LP and PV Hudson LLC; (d) the Official Committee of Unsecured Creditors; and (e) any party that has requested notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE NOTICE that on the date hereof, 356W58 Ground Lessor LLC ("Landlord") filed *356W58 Ground Lessor LLC's Motion to File Under Seal Declaration of Matthew B. McGuire in Support of 356W58 Ground Lessor LLC's Rent Motion Pre-Hearing Brief* (the "Motion")[2] with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, **prior to or at the hearing**. At the same time, you must serve a copy of the objection upon the undersigned counsel to Landlord so as to be received **prior to or at the hearing**.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON **SEPTEMBER 9, 2026 AT 9:30 A.M. (ET)** BEFORE THE HONORABLE KAREN B. OWENS, CHIEF UNITED STATES BANKRUPTCY COURT JUDGE FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM #3, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

[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' headquarters and the mailing address for the Debtors is 11440 San Vicente Boulevard, 2nd Floor, Los Angeles, CA 90045.

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

Dated: September 4, 2026
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Soumya P. Venkateswaran
Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Katherine S. Dute (No. 6788)
Soumya P. Venkateswaran (No. 7278)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
Email: landis@lrclaw.com
mcguire@lrclaw.com
dute@lrclaw.com
venkateswaran@lrclaw.com

– and –

ADLER & STACHENFELD LLP
Kirk L. Brett (admitted *pro hac vice*)
Patrick O'Connor (admitted *pro hac vice*)
555 Madison Avenue, 6th floor
New York, New York 10022
Telephone: (212)883-1700
Facsimile: (212)883-8883
Email: kbrett@adstach.com
poconnor@adstach.com

Counsel to 356W58 Ground Lessor LLC