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.	**Hearing Date: January 13, 2027, at 9:30 a.m. (ET)** **Objection Deadline: November 6, 2026, at 4:00 p.m. (ET)**

THIRD INTERIM APPLICATION OF BOIES SCHILLER FLEXNER LLP FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR THE DEBTORS FOR THE PERIOD FROM JULY 1, 2026, THROUGH SEPTEMBER 30, 2026 (SUMMARY)

Name of Applicant:	Boies Schiller Flexner LLP ("**BSF**")
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Period for Which Compensation and Reimbursement is Sought:	July 1, 2026, through September 30, 2026
Amount of Compensation Sought as Actual, Reasonable and Necessary:	$301,334.85 (July 1-31, 2026); $193,120.20 (August 1-31, 2026); $269,866.80 (September 1-30, 2026); totaling $764,321.85[2] (20% Holdback - $152,864.37)
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	$4,650.81 (July 1-31, 2026); $47,461.36 (August 1-31, 2026); $5,510.96 (September 1-30, 2026); totaling $57,623.13

This is a(n) √ Interim _____ Monthly _____ Final Fee Application.

[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] This figure reflects a 10% discount off BSF's standard hourly rates, in accordance with paragraph 3 of the Court's order authorizing the retention and employment of BSF [Dkt. No. 311].

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This is BSF's third interim application.

SUMMARY OF MONTHLY FEE APPLICATIONS FOR INTERIM PERIOD:

		REQUESTED		APPROVED		
DATE FILED	**PERIOD COVERED**	**FEES**	**EXPENSES**	**FEES (80%)**	**EXPENSES (100%)**	**HOLDBACK FEES (20%)**
8.28.26 [D.I. 658]	7.1.2026-7.31.2026	$301,334.85	$4,650.81	$241,067.88	$4,650.81	$60,266.97
9.10.2026 [D.I. 681]	8.1.2026-8.31.2026	$193,120.20	$47,461.36	$154,496.16	$47,461.36	$38,624.04
10.12.2026 [D.I. 720]	9.1.2026-9.30.2026	$269,866.80	$5,510.96	$215,893.44	$5,510.96	$53,973.36
TOTAL:		$764,321.85	$57,623.13	$611,457.48	$57,623.13	$152,864.37

SUMMARY OF OBJECTIONS TO MONTHLY FEE APPLICATIONS:

No objections received.[3]

[3] As of the filing of this Application, the deadline for any response to BSF's ninth monthly fee application covering services rendered in September 2026 has not yet passed.

Interim Application Summary

Name of Applicant	Boies Schiller Flexner LLP
Name of Client	Debtors and Debtors-in-Possession
Time period covered by Interim Application	July-September, 2026
Total compensation sought for Interim Period	$764,321.85
Total expense reimbursement sought for Interim Period	$57,623.13
Petition Date	October 22, 2025
Retention Date	Effective as of January 23, 2026
Date of order approving employment	February 10, 2026
Total allowed compensation paid to date	$3,273,588.54
Total allowed expenses paid to date	$940,239.85
Total compensation approved by interim order to date	$2,878,024.50
Total expenses approved by interim order to date	$888,127.68
Blended rate in Interim Application for all partners	$1,550.36*
Blended rate in Interim Application for all associates	$828.83
Blended rate in Interim Application for all paralegals	$423.00
Blended rate in Interim Application for all attorneys	$1,339.45
Blended rate in Interim Application for all timekeepers	$1,329.26

*All blended rates take into account the 10% rate discount being given by BSF, per footnote 2 above.

CUMULATIVE SUMMARY OF COMPENSATION BY PROFESSIONAL
FOR THE PERIOD JULY-SEPTEMBER, 2026

NAME OF PROFESSIONAL INDIVIDUAL	POSITION, YEAR OF OBTAINING RELEVANT LICENSE TO PRACTICE	HOURLY BILLING RATE	TOTAL HOURS BILLED: JULY AUGUST SEPTEMBER	TOTAL COMPENSATION
Robert Gordon	Partner, Member of the Illinois, Michigan, and NY Bars since 1989, 1993, and 2016	$1,890.00	85.8	$162,162.00
			48.5	$91,665.00
			57.6	$108,864.00
Robert Gordon	Partner, Member of the Illinois, Michigan, and NY Bars since 1989, 1993, and 2016	$945.00	7.5	$7,087.50
			0.0	$ 0.00
			4.0	$3,780.00
Michael Fay	Partner, Member of the New York Bar since 1988	$1,680.00	56.2	$94,416.00
			39.2	$65,856.00
			78.0	$131,040.00
Michael Fay	Partner, Member of the New York Bar since 1988	$840.00	0	$ 0.00
			0.0	$ 0.00
			4.0	$3,360.00
Jenny Kim	Partner, Member of the New York Bar since 2005	$1,520.00	0.0	$ 0.00
			0.0	$ 0.00
			0.3	$ 456.00
Sabina Mariella	Partner, Member of the New York Bar since 2017	$1,150.00	5.4	$6,210.00
			11.8	$13,570.00
			4.1	$4,715.00
Sabina Mariella	Partner, Member of the New York Bar since 2017	$575.00	0.0	$ 0.00
			0.0	$ 0.00
			0.0	$ 0.00
Katherine Zhang	Associate, Member of the New York Bar since 2021	$1,040.00	1.0	$1,040.00
			0.0	$ 0.00
			0.0	$ 0.00
Jeffrey Waldron	Associate, Member of the New York Bar since 2022	$1,000.00	46.5	$46,500.00
			7.7	$7,700.00
			9.2	$9,200.00
Virginia Su	Associate, Member of the New York Bar since 2023	$970.00	0.0	$ 0.00
			14.3	$13,871.00
			19.7	$19,109.00
Virginia Su	Associate, Member of the New York Bar since 2023	$485.00	0.0	$ 0.00
			0.0	$ 0.00

			4.0	$1,940.00
Julia Bevan	Associate, Member of the New York Bar since 2025	$870.00	0.0	$ 0.00
			3.5	$3,045.00
			0.0	$ 0.00
Roman Carlitti	Associate, Member of the New York Bar since 2026	$840.00	20.1	$16,884.00
			19.5	$16,380.00
			20.7	$17,388.00
Shari Ginsberg	Law Clerk	$500.00	0.0	$ 0.00
			0.0	$ 0.00
			0.0	$ 0.00
Leah Fields	Paralegal	$470.00	0.0	$ 0.00
			0.0	$ 0.00
			0.0	$ 0.00
Olivia Hill	Paralegal	$470.00	1.1	$ 517.00
			3.3	$1,551.00
			0.0	$ 0.00
Hunter Fernandez	Paralegal	$470.00	0.0	$ 0.00
			0.0	$ 0.00
			0.0	$ 0.00
Julia LoBello	Paralegal	$470.00	0.0	$ 0.00
			2.0	$ 940.00
			0.0	$ 0.00
		TOTAL:	**575.0**	**$849,246.50**
			LESS 10% DISCOUNT:	**$84,924.65**
			TOTAL COMPENSATION REQUESTED:	**$764,321.85**

CUMULATIVE SUMMARY OF PROFESSIONAL SERVICES RENDERED BY PROJECT CATEGORY FOR THE PERIOD JULY-SEPTEMBER, 2026

PROJECT CATEGORY	TOTAL HOURS	TOTAL FEES
Cash Collateral/Financing/Adequate Protection		
July 1-31, 2026	2.5	$4,252.50
August 1-31, 2026	3.5	$5,953.50
September 1-30, 2026	3.0	$5,103.00
Employment and Fee Applications		
July 1-31, 2026	6.8	$11,566.80
August 1-31, 2026	4.1	$6,974.10
September 1-30, 2026	3.0	$5,103.00
Executory Contracts/Unexpired Leases		
July 1-31, 2026	103.8	$136,085.40
August 1-31, 2026	111.9	$129,354.30
September 1-30, 2026	82.9	$101,349.90
A.P.: Debtors v. Purported Ground Lessor		
July 1-31, 2026	80.7	$104,041.80
August 1-31, 2026	4.4	$6,915.60
September 1-30, 2026	52.4	$74,164.50
A.P.: Interpleader (First American Title)		
July 1-31, 2026	3.2	$5,178.60
August 1-31, 2026	0.0	$0.00
September 1-30, 2026	0.0	$0.00
Case Administration		
July 1-31, 2026	8.0	$13,248.90
August 1-31, 2026	15.1	$25,551.90
September 1-30, 2026	22.3	$37,599.30
Asset Analysis, Recovery, and Disposition		
July 1-31, 2026	0.0	$0.00
August 1-31, 2026	0.0	$0.00

September 1-30, 2026	0.0	$0.00
Plan and Disclosure Statement		
July 1-31, 2026	7.0	$11,907.00
August 1-31, 2026	10.4	$17,690.40
September 1-30, 2026	2.9	$4,932.90
Claims Administration		
July 1-31, 2026	0.0	$0.00
August 1-31, 2026	0.0	$0.00
September 1-30, 2026	0.0	$0.00
Hearings		
July 1-31, 2026	5.1	$8,675.10
August 1-31, 2026	0.4	$680.40
September 1-30, 2026	23.1	$33,442.20
Non-Working Travel		
July 1-31, 2026	7.5	$6,378.75
August 1-31, 2026	0.0	$0.00
September 1-30, 2026	12.0	$8,172.00

CUMULATIVE EXPENSE SUMMARY FOR THE PERIOD JULY-SEPTEMBER, 2026

EXPENSE CATEGORY	SERVICE PROVIDER (IF APPLICABLE)	TOTAL EXPENSES
Copying: In-House Copies		
July 1-31, 2026		$0.00
August 1-31, 2026		$0.00
September 1-30, 2026		$0.00
Outside printing:		
July 1-31, 2026		$0.00
August 1-31, 2026		$0.00
September 1-30, 2026		$0.00
Computer Research		
July 1-31, 2026		$3.00
August 1-31, 2026		$1,681.61
September 1-30, 2026		$0.00
Courier/Messenger Services		
July 1-31, 2026		$167.32
August 1-31, 2026		$0.00
September 1-30, 2026		$65.08
Local Transportation		
July 1-31, 2026		$0.00
August 1-31, 2026		$0.00
September 1-30, 2026		$0.00
Expenses Incident to Overtime		
July 1-31, 2026		$0.00
August 1-31, 2026		$0.00
September 1-30, 2026		$0.00

Court Reporting Services/Transcripts		
July 1-31, 2026		$233.45
August 1-31, 2026		$6,876.50
September 1-30, 2026		$1,322.29
Meals:		
July 1-31, 2026		$0.00
August 1-31, 2026		$0.00
September 1-30, 2026		$0.00
Court fees:		
July 1-31, 2026		$0.00
August 1-31, 2026		$0.00
September 1-30, 2026		$0.00
Deposition transcripts:		
July 1-31, 2026		$0.00
August 1-31, 2026		$0.00
September 1-30, 2026		$0.00
Travel Expenses		
July 1-31, 2026		$1,225.75
August 1-31, 2026		$0.00
September 1-30, 2026		$2,721.81
Meeting Expenses		
July 1-31, 2026		$0.00
August 1-31, 2026		$0.00
September 1-30, 2026		$0.00
E-discovery/document management vendor		
July 1-31, 2026		$0.00
August 1-31, 2026		$0.00

September 1-30, 2026		$0.00
Experts and Consulting Fees		
July 1-31, 2026		$3,021.29
August 1-31, 2026		$38,903.25
September 1-30, 2026		$1,401.78
	TOTAL:	**$57,623.13**

COMPARABLE RATE DISCLOSURES

The average hourly rate for all BSF attorneys based in the U.S. for 2026 is $1,238.00, and the blended hourly rate for all BSF attorneys who rendered services to the Debtors during the Interim Period was $1,339.45.

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.	**Hearing Date: January 13, 2027, at 9:30 a.m. (ET)** **Objection Deadline: November 6, 2026, at 4:00 p.m. (ET)**

THIRD INTERIM APPLICATION OF BOIES SCHILLER FLEXNER LLP FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR THE DEBTORS FOR THE PERIOD FROM JULY 1, 2026, THROUGH SEPTEMBER 30, 2026

Boies Schiller Flexner LLP ("**BSF**"), counsel to the debtors and debtors-in-possession (the "**Debtors**"), hereby submits its third interim application (the "**Application**"), pursuant to sections 330 and 331 of title 11 of the United States Code §§ 101-1532 (the "**Bankruptcy Code**"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), Rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* entered December 10, 2025 [Docket No. 152] (the "**Interim Compensation Order**") for (i) interim allowance of compensation for professional services performed by BSF for the interim period from July 1, 2026, through and including September 30, 2026 (the "**Interim Period**") in the amount of $764,321.85 (the "**Interim Compensation Amount**") and payment of any outstanding balance of said amount; and (ii) interim allowance 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' mailing address is c/o FTI Consulting, Inc. Attn: Alan Tantleff, 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

its actual and necessary expenses in the amount of $57,623.13 (the "**Interim Expense Amount**") incurred during the Interim Period and payment of any outstanding balance of said amount. In support of this Application, BSF respectfully represents:

JURISDICTION AND VENUE

1. The Court has jurisdiction over the Debtors, their estates, and this matter 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 February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b).

2. Venue of this proceeding and this Application is proper in this district pursuant to 28 U.S.C. § 1408.

3. Pursuant to Local Rule 9013-1(f), BSF consents to the entry of a final order by the Court in connection with this Application, to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1.

BACKGROUND

A. GENERAL BACKGROUND

5. On October 22, 2025 (the "**Petition Date**"), the Debtors commenced with the Court voluntary cases (the "**Chapter 11 Cases**") under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

6. No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases. On November 25, 2025, the Office of the United States Trustee (the "**U.S.**

Trustee") appointed an official committee of unsecured creditors (the "**Committee**") in the Chapter 11 Cases.

7. On December 10, 2025, the Court entered the Interim Compensation Order. The Interim Compensation Order provides, among other things, that certain professionals in the Chapter 11 Cases ("**Professionals**") may submit monthly applications for interim compensation and reimbursement for expenses, pursuant to the procedures specified therein. If no objections are made within twenty-one (21) days after service of the monthly fee application the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. The Interim Compensation Order further provides, among other things, that Professionals may submit interim applications in three-calendar-month intervals for interim approval and allowance of the fees and expenses requested in the monthly fee applications for such three-month period. If no objections are timely interposed, the Debtors are authorized and directed to pay such Professionals any unpaid portions of their requested compensation and expense reimbursement for the three-month period.

B. THE RETENTION OF BSF

8. On January 27, 2026, the Debtors filed the *Application of the Debtors for Entry of an Order Authorizing the Retention and Employment of Boies Schiller Flexner LLP as Co-Counsel to the Debtors Effective as of January 23, 2026* [Dkt. No. 282].

9. On February 10, 2026, the Court entered the *Order Authorizing the Retention and Employment of Boies Schiller Flexner LLP as Co-Counsel to the Debtors Effective as of January 23, 2026* [Dkt. No. 311] (the "**Retention Order**").

SUMMARY OF APPLICATION FOR THE INTERIM PERIOD

10. By this Application, and in accordance with the Interim Compensation Order, BSF requests approval of the Interim Compensation Amount and the Interim Expense Amount for the Interim Period.

11. The Retention Order authorizes the Debtors to compensate BSF in accordance with the procedures set forth in Bankruptcy Code sections 330 and 331, the Bankruptcy Rules, the Local Rules, and such other procedures as fixed by order of the Court, including the Interim Compensation Order.

12. BSF has not received payment or any promises of payment from any non-Debtor source for services rendered, or to be rendered, in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between BSF and any other person, other than members of BSF, for the sharing of compensation received for services rendered in the Chapter 11 Cases.

13. BSF's monthly fee applications during the Interim Period have been filed and served in accordance with the Interim Compensation Order. Each of the monthly fee applications is incorporated by reference as if fully set forth herein.

RESPONSES TO FEE GUIDELINES QUESTIONNAIRE

QUESTION	RESPONSE	EXPLANATION
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	Yes.	BSF is providing a 10% discount off its standard hourly rates.
If the fees sought in this fee application as compared to the fees budgeted for this time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	Yes.	Yes.

QUESTION	RESPONSE	EXPLANATION
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No.	N/A
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices?	Yes.	A limited amount of time is included for preparation of fee applications.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?	Yes.	A limited amount of time is included for reviewing time records for confidentiality and redaction issues.
If the fee application includes any rate increases since retention: i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA formal Ethics Opinion 11-458?	N/A	N/A

RELIEF REQUESTED

14. By this Application, BSF requests that the Court grant interim allowance of one hundred percent (100%) of the Interim Compensation Amount and Interim Expense Amount. Monthly fee applications for the Interim Period detailing the time entries and expenses incurred were previously filed in accordance with the Interim Compensation Order. In addition, BSF requests that the Court authorize and direct the Debtors to pay to BSF the amount of $152,864.37, representing the twenty percent (20%) "holdback" of the Interim Compensation Amount, as well as any other unpaid portion of the fees and expenses incurred by BSF during the Interim Period and allowed pursuant to this Application.

15. All services for which compensation is requested by BSF were performed for or on behalf of the Debtors. All BSF's services were necessary and beneficial to the Debtors and their estates.

16. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, BSF respectfully submits that the amount requested by BSF is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, BSF has reviewed the requirements of Local Rule 2016-1 and the Interim Compensation Order and believes that this Application together with the previously filed monthly fee applications comply with said Rule and Order. To the extent that this Application and the previously filed monthly fee applications fail to comply with Local Rule 2016-1 in any respect, BSF submits that such non-compliance is non-material and respectfully requests that such non-compliance be waived.

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WHEREFORE, BSF respectfully requests that the Court (a) enter an order (i) granting interim allowance to BSF of fees in the amount of $764,321.85 and expenses in the amount of $57,623.13 (for a total of $821,944.98) incurred by BSF during the Interim Period, and (ii) authorizing and directing the Debtors to promptly pay to BSF any unpaid portion of the fees and expenses approved and allowed pursuant to this Application; and (b) grant to BSF such further relief as may be just and proper.

Dated: October 16, 2026
Wilmington, Delaware

BOIES SCHILLER FLEXNER LLP

/s/ Robert D. Gordon

Robert D. Gordon
Michael M. Fay
Jenny H. Kim
55 Hudson Yards
New York, New York 10001 Telephone:
(212) 446-2300 Email:
rgordon@bsfllp.com
mfay@bsfllp.com
jkim@bsfllp.com

CHIPMAN BROWN CICERO & COLE, LLP
William E. Chipman, Jr. (No. 3818)
Mark D. Olivere (No. 4291)
Hercules Plaza
1313 North Market Street, Suite 5400
Wilmington, Delaware 19801
Telephone: (302) 295-0191
Email: chipman@chipmanbrown.com
olivere@chipmanbrown.com

Counsel to the Debtors and Debtors in Possession

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.	**Hearing Date: January 13, 2027, at 9:30 a.m. (ET)** **Objection Deadline: November 6, 2026, at 4:00 p.m. (ET)**

NOTICE OF THIRD INTERIM APPLICATION OF BOIES SCHILLER FLEXNER LLP FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR THE DEBTORS FOR THE PERIOD FROM JULY 1, 2026, THROUGH SEPTEMBER 30, 2026

PLEASE TAKE NOTICE that on October 16, 2026, the above-captioned debtors and debtors in possession (the "**Debtors**") filed the *Third Interim Application of Boies Schiller Flexner LLP for Compensation and Reimbursement of Expenses as Counsel for the Debtors for the Period from July 1, 2026, Through September 30, 2026* (the "**Application**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Application, must be filed on or before **November 6, 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 the following parties so as to be received on or before the Objection Deadline:

(a) COUNSEL TO THE DEBTORS, (i) *Chipman Brown Cicero & Cole LLP*, 1313 North Market Street, Suite 5400 Wilmington, Delaware 19801 (Attn: William E. Chipman, Jr., Esquire, chipman@chipmanbrown.com and Mark D. Olivere, Esquire, olivere@chipmanbrown.com); and (ii) *Boies Schiller Flexner LLP,* 55 Hudson Yards, 20th Floor, New York, NY 10001 (Attn: Robert D. Gordon, Esquire, rgordon@bsfllp.com and Michael M. Fay, Esquire, mfay@bsfllp.com);

(b) COUNSEL TO THE DIP LENDER AND PRE-PETITION LENDER, *Hogan Lovells US LLP*, (i) 1999 Avenue of the Stars, Suite 1400, Los Angeles, California 90067 (Attn: Richard Wynne, Esquire and David P. Simonds, Esquire; richard.wynne@hoganlovells.com and david.simonds@hoganlovells.com); and (ii) 390 Madison Avenue, New York, New York, 10017 (Attn.: Christopher Bryant, Esquire; chris.bryant@hoganlovells.com);

[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.

(c) COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, (i) *Morris James LLP,* 3205 Avenue North Blvd., Suite 100, Wilmington, Delaware 19803 (Attn: Eric J. Monzo, Esquire, emonzo@morrisjames.com); and (ii) *Seward & Kissel LLP,* One Battery Park Plaza, New York, NY 10004, (Attn: Robert J. Gayda, Esquire, gayda@sewkis.com); and

(d) OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 (Attn: Linda J. Casey linda.casey@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that a hearing on the Application will be held on **January 13, 2027, at 9:30 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, Courtroom 3, Wilmington, Delaware 19801.

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

Dated: October 16, 2026
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark D. Olivere
William E. Chipman, Jr. (No. 3818)
Mark D. Olivere (No. 4291)
Aaron J. Bach (No. 7364)
Alison R. Maser (No. 7430)
Hercules Plaza
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 & FLENER LLP
Robert D. Gordon, Esq. (admitted *pro hac vice*)
Michael M. Fay. Esq. (admitted *pro hac vice*)
Jenny H. Kim (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

Counsel to the Debtors and Debtors in Possession