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)** **Objection Deadline: August 3, 2026, at 4:00 p.m. (ET)**

DEBTORS' THIRD MOTION FOR ENTRY OF AN ORDER, PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE, EXTENDING THE EXCLUSIVE PERIODS WITHIN WHICH THE DEBTORS MAY FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF

The above-captioned debtors and debtors-in-possession (the "**Debtors**"), by and through their undersigned counsel, hereby move (the "**Motion**") pursuant to section 1121(d) of title 11 of the United States Code, 11 U.S.C. § 101, *et seq*. (as amended or modified, the "**Bankruptcy Code**"), Rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and Rule 9006-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "**Proposed Order**") further extending the exclusive periods during which only the Debtors may file a chapter 11 plan and solicit acceptances thereof. In support of this Motion, the Debtors respectfully represent as follows:

INTRODUCTION

1. Section 1121(b) of the Bankruptcy Code provides for an initial period of one hundred twenty (120) days after the commencement of a chapter 11 case during which the Debtors have the exclusive right to file a chapter 11 plan (the "**Exclusive Filing Period**"). Furthermore,

[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.

section 1121(c)(3) of the Bankruptcy Code provides that if the Debtors file a plan within the Exclusive Filing Period, the Debtors have an exclusive period of one hundred eighty (180) days from the commencement of the chapter 11 case to solicit acceptances of and confirm such a plan (the "**Exclusive Solicitation Period**," and together with the Exclusive Filing Period, the "**Exclusive Periods**"). The initial Exclusive Filing Period in these cases extended through February 19, 2026, while the initial Exclusive Solicitation Period extended through April 20, 2026.

2. On February 9, 2026, the Court entered an order extending the Exclusive Periods [Docket No. 306] (the "**First Extension Order**") through and including May 20, 2026, and July 19, 2026, respectively.

3. On May 20, 2026, the Debtors filed a second motion to extend the Exclusive Periods, seeking an extension of 120 days for each Period [Docket No. 493]. On June 12, 2026, the Court entered an order further extending the Exclusive Periods [Docket No. 543] (the "**Second Extension Order**") by 60 days through and including July 20, 2026, and September 17, 2026, respectively.[2] The Second Extension Order was entered following agreement among the Debtors and the Official Committee of Unsecured Creditors (the "**Committee**") to reduce the Exclusive Periods extensions, without prejudice to seeking further extensions. *See* Docket No. 540.

4. Section 1121(d) of the Bankruptcy Code permits the Court to extend the Exclusive Periods "for cause." By this Motion, the Debtors request that (i) the Exclusive Filing Period be further extended by seventy (70) days, through and including September 28, 2026, and (ii) the Exclusive Solicitation Period be further extended by seventy (70) days, through and including

[2] Pursuant Local Rule 9006-2, the filing of this Motion prior to the Exclusive Periods serves to extend automatically the Exclusive Periods until such time as the Court rules on this Motion. *See* Del. Bankr. L.R. 9006-2.

November 27, 2026, pursuant to section 1121(d) of the Bankruptcy Code. For the reasons set forth herein, the Debtors submit that ample "cause" exists to grant such extensions.

JURISDICTION AND VENUE

5. The United States Bankruptcy Court for the District of Delaware (the "**Court**") has jurisdiction over these chapter 11 cases, the Debtors, property of the Debtors' estates, and these matters 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 February 29, 2012.

6. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A). Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final judgment or order with respect to this Motion if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

7. Venue of these cases in this District is proper under 28 U.S.C. §§ 1408 and 1409.

8. The statutory and legal predicates for the relief requested herein are section 1121(d) of the Bankruptcy Code, Bankruptcy Rule 9006(b), and Local Rule 9006-2.

BACKGROUND

9. 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).

10. The Debtors continue to be in possession of their properties, operate their business, and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

11. On November 25, 2025, the Office of the United States Trustee appointed the Committee [Docket No. 104]. No trustee or examiner has been appointed in these Chapter 11 Cases.

12. Additional factual background regarding the Debtors, including their business operations, their capital and debt structures and the events leading to the filing of these Chapter 11 Cases is set forth *Amended and Restated Declaration of Alan Tantleff in Support of Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 60] (the "**First Day Declaration**"), which is fully incorporated herein by reference.[3]

RELIEF REQUESTED

13. By this Motion, the Debtors request the Court enter the Proposed Order, pursuant to section 1121(d) of the Bankruptcy Code, further extending (i) the Exclusive Filing Period by seventy (70) days, through and including September 28, 2026, and (ii) the Exclusive Solicitation Period be extended by seventy (70) days, through and including November 27, 2026. The Debtors further request that entry of the Proposed Order be without prejudice to the Debtors' right to seek additional extensions of the Exclusive Periods (or to the rights of parties in interest to oppose such additional relief or to seek to shorten or terminate the Exclusive Periods).

BASIS FOR RELIEF

14. The Exclusive Periods under section 1121(d) of the Bankruptcy Code are intended to afford a debtor a full and fair opportunity to formulate and propose a chapter 11 plan and to solicit acceptances thereof without the disruption that might be caused by the filing of competing plans of reorganization by non-debtor parties. To this end, where the Exclusive Periods prove to

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[3] Capitalized terms used but not otherwise defined in this Motion shall have the meanings set forth in the First Day Declaration.

be unfeasible timeframes, section 1121(d)(1) of the Bankruptcy Code allows the Court to extend such exclusive periods for "cause."

15. Specifically, section 1121(d)(1) provides: "on request of a party in interest made within the respective periods specified in subsections (b) and (c) of this section and after notice and a hearing, the court may for cause ... increase the 120-day period or the 180-day period referred to in this section." 11 U.S.C. § 1121(d)(1).

16. Although the Bankruptcy Code does not define "cause" for purposes of an extension under section 1121(d), courts have identified several key factors relevant to a determination of whether cause exists under Bankruptcy Code section 1121(d), including the following: (a) the size and complexity of the case; (b) the necessity of sufficient time to permit the debtors to negotiate a plan of reorganization and prepare adequate information; (c) the existence of good faith progress toward reorganization; (d) the fact that the debtors are paying their bills as they become due; (e) whether the debtors have demonstrated reasonable prospects for filing a viable plan; (f) whether the debtors have made progress in negotiations with their creditors; (g) the amount of time which has elapsed in the case; (h) whether the debtors are seeking an extension of exclusivity in order to pressure creditors to submit to the debtors' reorganization demands; and (i) whether an unresolved contingency exists. *See In re Adelphia Commc'ns Corp.*, 336 B.R. 610, 674 (Bankr. S.D.N.Y. 2006); *In re Dow Coming Corp.*, 208 B.R. 661, 664-65 (Bankr. E.D. Mich. 1997).

17. Section 1121(d) of the Bankruptcy Code authorizes a bankruptcy court to extend the Exclusive Periods by as much as eighteen (18) months (to file a plan) and twenty (20) months (to solicit votes) for cause, based upon the relevant facts and circumstances. *See* 11 U.S.C. § 1121(d). In evaluating whether an extension under section 1121(d) of the Bankruptcy Code is

warranted, courts are given maximum flexibility to review the particular facts and circumstances of each case. *See e.g., In re Borders Grp., Inc.*, 460 B.R. 818, 821-22 (Bankr. S.D.N.Y. 2011) ("The determination of cause under section 1121(d) is a fact-specific inquiry and the court has broad discretion in extending or terminating exclusivity"); *In re AMKO Plastics, Inc.*, 197 B.R. 74, 77 (Bankr. S.D. Ohio 1996) ("[A]pplying the 'flexibility' in dealing with the question of extension of exclusivity which the cases suggest …. we hold that debtor has shown cause for the extension ...."); *In re Pub. Serv. Co. of N.H.*, 88 B.R. 521, 534 (Bankr. D.N.H. 1988) ("[T]he legislative intent has been construed to leave the question to the reorganization court in the exercise of its discretion and to promote maximum flexibility to suit various types of reorganization proceedings."). Not all the above factors are necessary and relevant in determining whether to grant an extension of the exclusivity periods. *See e.g., In re Express One Int'l Inc.*, 194 B.R. 98,100-101 (Bankr. E.D. Tex. 1996) (identifying only four of the factors as relevant in determining whether cause exists to support an extension).

18. As explained below, sufficient cause exists in these Chapter 11 Cases to extend the Debtors' Exclusive Periods pursuant to section 1121(d) of the Bankruptcy Code.

19. The Debtors have been operating under the protection of chapter 11 for approximately nine months, and during this period of time have made significant and material progress in administering these Chapter 11 Cases. The modest extension requested in this Motion will preserve the Debtors' exclusive opportunity to propose and seek confirmation of a chapter 11 plan, pending the Court's September 9, 2026, hearings regarding, among other things, the motion to dismiss filed by the Defendant in the Recharacterization Action (defined below), as discussed below. Thus, the relief requested in this Motion is properly tailored to the calendar in these Chapter 11 Cases.

A. THE DEBTORS HAVE SHOWN GOOD FAITH PROGRESS IN THESE CHAPTER 11 CASES.

20. The requested extension is reasonable given the Debtors' progress to date and the current posture of these Chapter 11 Cases. Since the Petition Date, the Debtors and their advisors have worked diligently to administer these cases as efficiently as possible to minimize administrative expenses and maximize recoveries. To that end, the Debtors have, among other things: (i) negotiated and obtained Court approval of the Debtors' postpetition financing credit facility; (ii) engaged professionals to address the stop work order for redevelopment and construction of the Hudson Hotel project; (iii) sought discovery from the Debtors' prior owners needed for the administration of these Chapter 11 Cases; (iv) prepared and filed the Debtors' Schedules of Assets and Liabilities and Statements of Financial Affairs; (v) prepared and filed the Debtors' monthly operating reports; (vi) retained Debtors' professionals; (vii) addressed, and resolved in a timely manner, challenges related to the Debtors' businesses and the chapter 11 efforts; (viii) responded to creditor inquiries; (ix) addressed issues as necessary and participated in settlement negotiations relative to the interpleader adversary proceeding (A.P. Case No. 25-52468 (KBO)) (the "**Interpleader Action**"); (x) moved for and obtained entry of an order by the Court establishing claims bar dates and related procedures; (xi) successfully prosecuted their motion for a determination that the purported ground lease, if a lease, is a lease of residential real property governed by section 365(d)(2) of the Bankruptcy Code, including participating in discovery and an evidentiary hearing, resulting in a ruling by the Court granting the motion (the "**Residential Lease Order**"); (xii) successfully prosecuted their motion for approval of a Supplemental DIP Budget; (xiii) prepared and filed an amended complaint in the adversary proceeding seeking recharacterization of the purported ground lease as a loan instrument (A.P. Case No. 25-52471 (KBO)) (the "**Recharacterization Action**"); and (xiv) filed the *Debtors' Motion for an Order*

Determining Amount of Prospective Post-Petition Monthly Rent Due as an Administrative Expense Claim [Dkt. No. 524] (the "**Rent Motion**").

21. At the same time, the Debtors have prudently managed the real property that is the subject of these Chapter 11 Cases, including conducting major repairs and property improvements, advancing the development of the LA Fitness commercial space, providing services to residential tenants, conducting as-needed day-to-day repair and maintenance, renewing insurances, and adhering to all local laws governing real estate in The City of New York. In this regard, the Debtors submit the *Declaration of Glenn Brill* attached hereto as **Exhibit B.**

22. Going forward, the Debtors are in the process of addressing numerous pressing matters, including: (i) defending a motion to dismiss the Debtors' amended complaint in the Recharacterization Action; (ii) engaging in discovery and preparing for an evidentiary hearing with respect to the Rent Motion; and (iii) participating in the ground lessor's appeal of the Residential Lease Order to the Third Circuit Court of Appeals.

23. In particular, completing the trial in the Recharacterization Action is critical to the Debtors' formulation of a plan of reorganization. As the Court is aware, the Debtors worked diligently to prepare for an expedited trial in this matter and will continue to press for an expeditious trial. However, in light of the pending motion to dismiss the Debtors' amended complaint, the Debtors hereby seek only an extension of the Exclusivity Periods to accommodate the hearing on that motion on September 9, 2026, a subsequent ruling by the Court, and presumably some reasonable period thereafter in which the Debtors may determine and take next steps. Depending on whether and to what extent the Debtors are successful in defeating that motion, the Debtors expect to file another motion seeking a further extension of the Exclusive Periods, as appropriate.

24. The Debtors submit that their progress to date, the nature and extent of activity contemplated in the ensuing months, and the narrowly tailored relief requested provide ample cause to extend the Exclusive Periods pursuant to this Motion.

B. The Need For Sufficient Time To Negotiate And Prepare Adequate Information.

25. The relief requested herein will facilitate the Debtors' efforts by providing the Debtors with a bridge to a full and fair opportunity to resolve open case issues, evaluate certain claims, and formulate, draft, propose, and solicit a plan without the potential distraction of ill-formed competing plans. *See In re Energy Conversion Devices, Inc.*, 474 B.R. 503, 507 (Bankr. E.D. Mich. 2012) ("In enacting 11 U.S.C. § 1121, Congress intended to allow the debtor a reasonable time to obtain confirmation of a plan without the threat of a competing plan. It was intended that at the outset of a Chapter 11 case a debtor should be given the unqualified opportunity to negotiate a settlement and propose a plan of reorganization without interference from creditors and other interests.") (*internal citations and quotations omitted*).

C. An Extension Will Advance These Chapter 11 Cases And Will Not Harm Any Party.

26. This Motion is the Debtors' third request for an extension of the Exclusive Periods, and the request will not unfairly prejudice or pressure the Debtors' creditor constituencies or grant the Debtors any unfair bargaining leverage. Importantly, the Debtors are not seeking an extension to delay administration of these Chapter 11 Cases or to exert pressure on their creditors, but rather to resolve issues related to any potential plan and continue the orderly, efficient, and cost-effective chapter 11 process. Further, the relief requested is without prejudice to the right of any party in interest to seek to shorten or terminate the Exclusive Periods. Accordingly, the Debtors believe that the requested extension is warranted and appropriate under the circumstances.

27. Based on the foregoing, the Debtors respectfully submit that cause exists, pursuant to section 1121(d) of the Bankruptcy Code, for the Court to extend (i) the Exclusive Filing Period by seventy (70) days through September 28, 2026, and (ii) the Exclusive Solicitation Period by seventy (70) days, through and including November 27, 2026.

WHEREFORE, for the reasons stated herein, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto, granting the relief requested in the Motion and such other and further relief as is just and proper.

Dated: July 20, 2026
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ William E. Chipman, Jr.
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-and-

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Counsel to the Debtors and Debtors in Possession

EXHIBIT A

(*Proposed* Order)

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) **Related Docket No. ____**

ORDER, PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE, FURTHER EXTENDING THE EXCLUSIVE PERIODS WITHIN WHICH THE DEBTORS MAY FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF

Upon consideration of the motion (the "**Motion**")[2] of the Debtors for entry of an order, pursuant to section 1121(d) of the Bankruptcy code, Bankruptcy Rule 9006, and Local Rule 9006-2, extending the Debtors' Exclusive Periods to file a chapter 11 plan and solicit acceptances thereof; and upon consideration of all pleadings related thereto; and due and proper notice of the Motion having been given; and it appearing that no other or further notice of the Motion is required; and the Court having jurisdiction to consider the Motion in accordance with 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 February 29, 2012, and that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that venue of this matter is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it further appearing that the relief requested in the Motion and provided for herein is in the best interest of the Debtors, their creditors, their estates, and all other parties in interest; and sufficient cause appearing therefor;

[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] All capitalized terms not otherwise defined herein shall have the same meanings ascribed to them in the Motion.

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The Debtors' Exclusive Filing Period is hereby extended by seventy (70) days, through and including September 28, 2026.

3. The Debtors' Exclusive Solicitation Period is hereby extended by seventy (70) days, through and including November 27, 2026.

4. The entry of this order shall be without prejudice to the rights of the Debtors and their estates to seek further extensions of the Exclusive Periods or to seek other appropriate relief and the rights of any party in interest to oppose such relief or to seek to shorten or terminate the Exclusive Periods.

5. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

6. The Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or related to this Order.

EXHIBIT B

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
HUDSON 1701/1706, LLC, *et al.*,[1]	Case Nos. 25-11853 (KBO)
	(Jointly Administered)
Debtors.	

DECLARATION OF GLENN BRILL IN SUPPORT OF DEBTORS' THIRD MOTION FOR ENTRY OF AN ORDER, PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE, EXTENDING THE EXCLUSIVE PERIODS WITHIN WHICH THE DEBTORS MAY FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF

I, Glenn Brill, hereby declare, under penalty of perjury, that the following is true to the best of my knowledge, information, and belief:

1. I am a Managing Director of Real Estate Solutions at FTI Consulting, Inc. ("**FTI**"). FTI has been retained by Hudson 1701/1706, LLC and Hudson 1702, LLC (collectively, the "**Debtors**"). The Debtors retained FTI, effective as of October 22, 2025 (the "**Petition Date**"), for FTI personnel to act as Co-Chief Restructuring Officers for the Debtors and to otherwise support the Debtors' operations. *See* ECF No. 149.

2. I submit this Declaration in support of the *Debtors' Third Motion for Entry of an Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Extending the Exclusive Periods*

[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.

Within Which the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof (the "**Exclusivity Motion**").

3. I have over 30 years of experience providing advisory services for real estate development and construction projects for office, retail, multifamily, and mixed-use assets. My experience includes managing stakeholders and client relations, appraisal review and valuation, benchmarking, project management oversight, and strategic planning for "ground-up" and adaptive reuse development projects including distressed assets.

4. Except as otherwise stated, all facts set forth in this Declaration are based upon my personal knowledge, my discussions with those reporting directly to and working with me, my review of relevant documents and contemporaneous business records regularly kept and maintained by the Debtors, or my discussions with representatives of various contractors and subcontractors employed by the Debtors. If called upon to testify, I could and would testify competently to the facts set forth in this Declaration.

A. <u>Background</u>

5. Since the Debtors retained FTI in October 2025, I have been responsible for supporting them in connection with their efforts to redevelop the former Hudson Hotel (the "**Property**") into a multi-family housing complex. I have worked closely with the Debtors' property manager, land-use counsel, development advisor, designated general contractor and design professionals. I also oversee expenditures on the redevelopment project (the "**Project**") and have reviewed the history of the Project's construction to date and what remains to be completed.

B. <u>Progress on the Project</u>

6. Progress on the Project has been impaired due to stop-work orders issued by The New York Department of Housing, Preservation & Development ("**HPD**") and Department of Buildings ("**DOB**"). Nonetheless, as stated in the Exclusivity Motion, the Debtors have made significant progress on matters not prohibited by the stop-work orders, which will ultimately facilitate the lifting of the stop-work orders.

7. Since October 2025, the Debtors and FTI have worked diligently to lift the stop-work orders so that the Project can be completed. The Debtors have also retained Tri-Hill Management LLC ("**Tri-Hill**") to act as the Property Manager for the Hudson. Tri-Hill's responsibilities include daily operations, staffing, maintenance and repairs, rent collections, and bookkeeping services. PV Hudson, LLC (owner of the Debtors) and the Debtors have retained Taconic Development Advisors, LLC ("**Taconic**") to act as the Debtors' development advisor for the completion of the Project. Under FTI's oversight, Taconic and the Project's designated general contractor, DeSimone Builders ("**DeSimone**"), have surveyed the work in place, assessed conformance with existing construction drawings and building codes, evaluated the workmanship of completed work, identified material inventories, and developed a highly detailed estimate of the cost to complete the Project. Taconic has also re-engaged important contributors to the Project. Tang Studio Architect ("**Tang**") has been re-engaged as the Project architect. In conjunction with Tang, the Debtors have retained Jams Consultants, Inc. to provide building code analyses and to expedite the reopening of existing building permits once the stop-work orders are lifted. Also, MG Engineering D.P.C. has been re-engaged as the Project's mechanical, electrical and plumbing engineer.

8. The Debtors have also engaged Douglas Elliman, LLC as its multi-family market advisor in coordination with Taconic to provide assistance with respect to marketing the Property as a multi-family apartment complex.

9. Since the Petition Date, FTI and those that FTI supervises have also performed other work on behalf of the Debtors, all of which is aimed at advancing and restarting the Project, including:

- planning future construction staging with DeSimone including vertical transportation necessary to support tenant building services, construction and other activities;
- reviewing and resolving existing violations at the Property with various government agencies, including HPD, DOB, the Department of Transportation, and the New York City Fire Department;
- ongoing revisions to the Project's tenant protection plan ("**TPP**") to ensure continued habitability and life-safety compliance for residential occupants;
- working toward completing the landlord improvements for the LA Fitness gym, which will create an attractive amenity to attract future residential tenants;
- ensuring repairs and updates to existing elevators and heating/domestic hot water system; and
- regularly inspecting the Property for safety and compliance purposes.

10. A detailed Summary of safety improvements and regulatory compliance work at the Property is attached hereto as **Exhibit 1**.

Dated: July 20, 2026
New York, New York

By: */s/ Glenn Brill*
Glenn Brill

Exhibit 1 to Glenn Brill Declaration

Summary of Building Safety Improvements & Regulatory Compliance Work

Over the past several months, the Hudson 1701/1706, LLC and Hudson 1702, LLC (collectively, the "Debtors") have completed a wide range of capital repairs, emergency responses, and regulatory compliance projects throughout the building, as set forth below.

1. Facade Safety & Local Law 11 (FISP) Compliance

Local Law 11 (the Facade Inspection Safety Program, or FISP) requires periodic inspection and repair of a building's exterior walls to protect residents and pedestrians from deteriorating façade conditions. Work completed and ongoing under this program includes:

- **Inspection of Windows to Determine Repairs:** A building-wide survey of window conditions to identify units and areas requiring repair, addressing both safety hazards and weatherproofing.
- **Local Law 11 Additional Inspections, Protections & Coping:** Supplemental facade inspections, installation and maintenance of protective sidewalk sheds to guard against falling debris, and repair of parapet coping to stop water infiltration.
- **Additional Local Law 11 Work:** Further facade repairs identified through inspection, and ongoing to bring the building into full compliance and resolve unsafe exterior conditions.

2. Heating System & Boiler Repairs

Reliable heat and domestic hot water are essential to resident safety and comfort. The following repairs addressed both immediate issues and the system's long-term reliability:

- **Initial Boiler Repairs:** First-phase repairs to resolve immediate operational issues and restore reliable heat and hot water.
- **Repair of Circulating Pump at Boiler:** Repair of the pump that circulates heated water through the building's radiators, essential to even heat distribution.
- **Emergency Plumbing/Boiler Repairs:** Urgent, unscheduled repairs performed in response to acute plumbing and heating issues, protecting resident habitability.
- **Future Work to Resolve Heating System:** Planned next-phase work to deliver a, comprehensive resolution for the building's heating system.

3. Fire & Life Safety Systems

These repairs maintain the building's core fire detection and suppression systems:

- **Fire Alarm Repairs:** Ongoing repairs to the building's fire alarm and detection system to ensure early warning in the event of fire.
- **Sprinkler Repairs:** Ongoing repairs to the automatic fire sprinkler suppression system, a core life-safety system for containing fire.

4. Tenant Protection Plan (Construction Safety Compliance)

Whenever construction work is permitted in an occupied residential building, NYC Department of Buildings regulations require a Tenant Protection Plan (TPP) to safeguard means of egress, fire safety, and resident wellbeing for the duration of the work:

- **TPP –Filing:** Filing a revised Tenant Protection Plan with the NYC Department of Buildings, outlining the measures in place to protect residents during construction.
- **TPP –Repairs:** Immediate life-safety repairs completed as part of the revised filing, resolving conditions that needed to be addressed before or in anticipation of future work.
- **TPP – Monthly Inspections:** Ongoing monthly inspections by a licensed engineer confirming that all required tenant protection measures remain in place and effective.

5. Emergency Power

- **Generator Improvements:** Upgrades and repairs to the building's emergency backup generator, helping ensure power for life-safety systems.

The Debtors remain committed to maintaining a safe, well-functioning building for all residents.

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: September 15, 2026 at 10:30 a.m. (ET) Objection Deadline: August 3, 2026 at 4:00 p.m. (ET)

NOTICE OF DEBTORS' THIRD MOTION FOR ENTRY OF AN ORDER, PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE, EXTENDING THE EXCLUSIVE PERIODS WITHIN WHICH THE DEBTORS MAY FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF

PLEASE TAKE NOTICE that on July 20, 2026, the above-captioned debtors and debtors-in-possession (the "**Debtors**") filed the *Debtors' Third Motion for Entry of an Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Extending the Exclusive Periods Within Which the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof* (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion, must filed on or before August 3, 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, (i) 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] and (ii) 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]; and (b) the Office of the United States Trustee for Region 3, J. Caleb Boggs Federal Building, 844 King Street, Lockbox 35, Wilmington, Delaware 19801 (Attn: Linda Casey; [linda.casey@usdoj.gov]), so as to be received on or before the Objection Deadline.

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.

[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 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: July 20, 2026
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

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