

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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|-------------------------|---|---|
| In re:                  | ) |   |
|                         | ) | Chapter 11  |
|                         | ) |   |
| NEWBURY COMMON          | ) | Case No. 15-12507 (LSS)                                       |
| ASSOCIATES, LLC et al., | ) |   |
|                         | ) | Jointly Administered  |
| Debtors <sup>1</sup> .  | ) |   |
|                         | ) | <b>Hearing Date: February 1, 2016 at 10:00 a.m. (ET)</b>      |
|                         | ) | <b>Objection Deadline: January 25, 2016 at 4:00 p.m. (ET)</b> |

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**NOTICE OF MOTION**

TO: (A) THE OFFICE OF THE UNITED STATES TRUSTEE FOR REGION 3, SERVING THE DISTRICT OF DELAWARE; (B) THE MEZZANINE LENDERS AND THEIR COUNSEL TO THE EXTENT KNOWN; (C) THE UNITED STATES ATTORNEY’S OFFICE FOR THE DISTRICT OF DELAWARE; (D) THE UNITED STATES ATTORNEY GENERAL; (E) THE INTERNAL REVENUE SERVICE; (F) THE PARTIES INCLUDED ON THE DEBTORS’ LIST OF LARGEST UNSECURED CREDITORS; AND (F) ALL PARTIES WHO HAVE FILED A NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS PURSUANT TO BANKRUPTCY RULE 2002

**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) have filed the attached *Debtors’ Motion for Entry of an Order Authorizing the Debtors to (I) Employ and Retain Beilinson Advisory Group as Restructuring Advisors for the Debtors and Debtors in Possession Pursuant to 11 U.S.C. § 363, and (II) Designate Marc Beilinson as Chief Restructuring Officer Effective Nunc Pro Tunc to the Petition Date* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that any objections to the relief requested in the Motion must be filed on or before **January 25, 2016 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 and served on the undersigned proposed co-counsel to the Debtors so as to be received on or before the Objection Deadline.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Newbury Common Associates, LLC (3783); Seaboard Realty, LLC (6291); 600 Summer Street Stamford Associates, LLC (6739); Seaboard Hotel Member Associates, LLC (8984); Seaboard Hotel LTS Member Associates, LLC (6005); Park Square West Member Associates, LLC (9223); Seaboard Residential, LLC (2990); One Atlantic Member Associates, LLC (4120); 88 Hamilton Avenue Member Associates, LLC (5539); 316 Courtland Avenue Associates, LLC (0290); 300 Main Management, Inc. (6365); 300 Main Street Member Associates, LLC (2334); PSWMA I, LLC (6291); PSWMA II, LLC (6291); and Tag Forest, LLC (8974). The Debtors’ corporate headquarters is located at, and the mailing address for each Debtor is, 1 Atlantic Street, Stamford, CT 06901.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON FEBRUARY 1, 2016 AT 10:00 A.M. (ET) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6<sup>TH</sup> FLOOR, COURTROOM #2, WILMINGTON, DELAWARE 19801.**

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

Dated: January 8, 2016  
Wilmington, Delaware

Respectfully submitted,

By: /s/ Sean T. Greecher  
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- and -

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*Proposed Attorneys for the Debtors and  
Debtors in Possession*