

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

	)	
In re:	)	Chapter 11
	)	
NEWBURY COMMON	)	Case No. 15-12507 (LSS)
ASSOCIATES, LLC, <u>et al.</u> ,	)	
	)	Jointly Administered
Debtors <sup>1</sup> .	)	
	)	<b>Hearing Date: February 29, 2016 at 10:00 a.m. (ET)</b>
	)	<b>Objection Deadline: February 22, 2016 at 4:00 p.m. (ET)</b>

**NOTICE OF MOTION**

TO: (A) THE OFFICE OF THE UNITED STATES TRUSTEE; (B) THE PREPETITION MORTGAGE LOAN SERVICERS, TRUSTEES, LENDERS AND THEIR RESPECTIVE COUNSEL; (C) THE MEZZANINE LENDERS AND THEIR COUNSEL TO THE EXTENT KNOWN; (D) THE UNITED STATES ATTORNEY’S OFFICE FOR THE DISTRICT OF DELAWARE; (E) THE UNITED STATES ATTORNEY GENERAL; (F) THE INTERNAL REVENUE SERVICE; (G) THE PARTIES INCLUDED ON THE DEBTORS’ LIST OF LARGEST UNSECURED CREDITORS; (H) THE ORDINARY COURSE PROFESSIONALS SET FORTH ON **EXHIBIT A** HERETO; AND (I) 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 *Motion of Debtors for Order Authorizing Employment and Retention of Professionals Used in the Ordinary Course of Business* (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 **February 22, 2016 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 824 N. Market

<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); Tag Forest, LLC (8974); Newbury Common Member Associates, LLC (3909); Century Plaza Investor Associates, LLC (1480); Seaboard Hotel Associates, LLC (2281); Seaboard Hotel LTS Associates, LLC (8811); Park Square West Associates, LLC (9781); Clocktower Close Associates, LLC (3154); One Atlantic Investor Associates, LLC (7075); 88 Hamilton Avenue Associates, LLC (5749); 220 Elm Street I, LLC (7540); and 300 Main Street Associates, LLC (8501). The Debtors’ corporate headquarters is located at, and the mailing address for each Debtor is, 1 Atlantic Street, Stamford, CT 06901.

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.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON FEBRUARY 29, 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: February 10, 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*