

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

In re:  Newbury Common Associates, LLC, <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 11  Case No: 15-12507 (LSS) (Jointly Administered)  <b>RE: D.I. 258</b>
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**MOTION TO SHORTEN NOTICE REGARDING THE MOTION OF PATRIOT BANK,  
N.A. TO TRANSFER VENUE OF THESE CHAPTER 11 CASES TO THE  
UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF CONNECTICUT**

Patriot Bank, N.A. ("Patriot Bank" or "Movant"), by and through its undersigned counsel, moves this Honorable Court, pursuant to Local Rule 9006-1(e) (the "Motion to Shorten"), for an Order, substantially in the form of the proposed order attached hereto as Exhibit A, shortening notice of the Motion of Patriot Bank, N.A. to Transfer Venue of Cases to the United States Bankruptcy Court for the District of Connecticut (the "Venue Motion"). In support of the Motion to Shorten, Patriot Bank respectfully states as follows:

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<sup>1</sup> The "Original Debtors" in these chapter 11 cases, along with the last four digits of each Original 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 "Additional Debtors" in these chapter 11 cases, along with the last four digit of each Additional Debtor's tax identification number, are: 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.

1. Del. Bankr. LR 9006-1(c) provides that unless the Federal Rules of Bankruptcy Procedure or the Local Rules state otherwise, “all motion papers shall be filed and served in accordance with Local Rule 2002-1(b) at least eighteen (18) days (twenty-one (21) days if service is by first class mail; nineteen (19) days if service is by overnight delivery) prior to the hearing date.” Del. Bankr. LR 9006-1(e) provides in pertinent part that “no motion will be scheduled on less notice than required by these Rules or the Fed. R. Bankr. P. except by order of the Court, on written motion (served on all interested parties) specifying the exigencies justifying shortened notice.”

2. Patriot Bank seeks to shorten the period in which it is required to give notice of the hearing for approval of the Venue Motion.

3. In support of this Motion to Shorten, Patriot Bank represents that a prompt hearing on the Venue Motion is in the best interest of the Debtors’ creditors and the efficient administration of these estates.

4. Pursuant to the Motion, Patriot Bank seeks to transfer (“Transfer”) venue of the bankruptcy cases (“Chapter 11 Cases”) filed by the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) to the United States Bankruptcy Court for the District of Connecticut (“Connecticut Bankruptcy Court”) pursuant to 28 U.S.C. §§ 1404 and 1412 and Rule 1014 of the Federal Rules of Procedure (“Rules”). As further described in the Venue Motion, it is clear that the preponderance of the evidence supports transferring venue to the District of Connecticut for the convenience of the parties and in the interest of justice. Among other things, the Debtors’ Properties are located in Connecticut. The Debtors’ headquarters is in Connecticut, the majority of the Debtors are domiciled exclusively in Connecticut, and the majority of creditors are located in Connecticut.

5. Furthermore, failure to promptly transfer these Chapter 11 Cases to the Connecticut Bankruptcy Court will unduly delay the efficient administration of these estates. Specifically, delay in considering the Venue Motion is against the interest of judicial economy, as much of the work performed by this Court until the cases are transferred would need to be redone in Connecticut. Also, delaying consideration of the Venue Motion will cause the Debtors' estates to expend its limited resources duplicating their efforts if the Venue Motion is granted. Accordingly, the Debtors respectfully request that notice of the Motion be shortened so that the Motion can be heard on February 29, 2016, at 10:00 a.m., the next scheduled hearing date in these Chapter 11 Cases.

6. Patriot Bank submits that hearing the Venue Motion on shortened notice will not prejudice any parties in interest. This Motion to Shorten and the Venue Motion will be served on (i) the Debtors' top 30 creditors; (ii) the Office of the United States Trustee; and (iii) those persons who have requested notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure. Under the circumstances, Patriot Bank respectfully submits that good cause exists to approve the reduction in notice requested herein with respect to the Venue Motion.

WHEREFORE, for the reasons set forth, Patriot Bank respectfully requests the entry of an Order, substantially in the form attached hereto as Exhibit A, approving the shortening of notice and expedited consideration of the Venue Motion and granting such other relief as this Court deems just and proper.

Dated: February 22, 2016  
Wilmington, Delaware

Respectfully submitted,

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