

**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. ¹)	220 Elm Street II, LLC (<i>Joint Administration</i>
)	<i>Requested</i>)
)	
)	Hearing Date: April 29, 2016 at 10:00 a.m. (ET)
)	Obj. Deadline: April 12, 2016 at 4:00 p.m. (ET)
)	
)	Re: Docket No. 411

NOTICE OF MOTION

TO: (A) THE U.S. 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 PARTIES INCLUDED ON THE DEBTORS’ LIST OF LARGEST UNSECURED CREDITORS; (E) ANY PARTY THAT MAY ASSERT A LIEN IN THE DEBTORS’ ASSETS; (F) ALL APPLICABLE FEDERAL, STATE AND LOCAL TAXING AND REGULATORY AUTHORITIES HAVING JURISDICTION OVER THE ASSETS; (G) ALL PARTIES KNOWN TO THE DEBTORS WHO HOLD ANY LIENS OR SECURITY INTEREST IN THE DEBTORS’ ASSETS WHO HAVE FILED UCC-1 FINANCING STATEMENTS AGAINST THE DEBTORS, OR WHO, TO THE DEBTORS’ KNOWLEDGE, HAVE ASSERTED ANY LIENS ON ANY OF THE DEBTORS’ ASSETS; AND (H) ALL PARTIES WHO HAVE FILED A NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS PURSUANT TO BANKRUPTCY RULE 2002.

¹ 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); 300 Main Street Associates, LLC (8501); and 220 Elm Street II, LLC (7625). The Debtors’ corporate headquarters is located at, and the mailing address for each Debtor is, 1 Atlantic Street, Stamford, CT 06901.

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) previously filed the *Debtors’ Motion for Entry of (A) Order (i) Scheduling a Hearing to Consider Approval of the Sale or Sales of the Debtors’ Assets, and the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (ii) Approving Certain Bidding Procedures, Assumption and Assignment Procedures, and the Form and Manner of Notice Thereof, and (iii) Granting Related Relief; and (B) One or More Orders (i) Approving the Sales or Other Acquisition Transactions for the Properties, (ii) Authorizing the Sales Free and Clear of All Encumbrances, (iii) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (iv) Granting Related Relief* [Docket No. 411] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware. A copy of the Motion is being served with this Notice.

PLEASE TAKE FURTHER NOTICE that any objections to the relief requested in the Motion must be filed on or before **April 12, 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, 3rd Floor, Wilmington, Delaware 19801 and served on the undersigned proposed attorneys to the Debtors (**Attn: Joel A. Waite, Sean T. Greecher and Ryan M. Bartley**) 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 April 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, 6TH 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: March 28, 2016
Wilmington, Delaware

Respectfully submitted,

By: /s/ Sean T. Greecher
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Debtors in Possession*