

**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)	
)	Hearing Date: May 18, 2017 at 10:00 a.m. (ET)
)	(requested)
)	Obj. Deadline: May 17, 2017 at 8:00 p.m. (ET)
)	(requested)

NOTICE OF MOTION

TO: (A) THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (B) THE PREPETITION MORTGAGE LOAN SERVICERS, TRUSTEES, LENDERS AND THEIR RESPECTIVE COUNSEL; (C) THE PARTIES INCLUDED ON THE DEBTORS’ LIST OF LARGEST UNSECURED CREDITORS; AND (D) 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 to Approve Settlement Agreement by and Among Debtors, Settling Lenders, Wilmington Trust, N.A., Chicago Title Insurance Company, and First American Title Insurance Company* (the “Settlement Motion”).

PLEASE TAKE FURTHER NOTICE THAT THE DEBTORS HAVE ALSO FILED A MOTION (the “Motion to Shorten”) REQUESTING THAT A HEARING TO CONSIDER THE SETTLEMENT MOTION BE HELD ON **MAY 18, 2017 AT 10:00 AM (ET)** (the “Hearing”) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, IN

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.

THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE,
824 N. MARKET STREET, 6th FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE
19801.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Motion to Shorten, the Debtors have requested that responses, if any, to the relief requested in the Settlement Motion be filed on or before **May 17, 2017 at 8:00 p.m. (ET)** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon the undersigned counsel to the Debtors so as to be received on or before the Objection Deadline.

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

Dated: May 12, 2017
Wilmington, Delaware

Respectfully submitted,

By: /s/ Ryan M. Bartley

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