

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

IN RE)	Chapter 11
)	
WOODBRI LLC, <i>et al.</i> , ¹)	Case No. 17-12560-KJC
)	(Jointly Administered)
Debtors.)	
)	

MOTION BY THE U.S. SECURITIES AND EXCHANGE COMMISSION FOR ORDER SCHEDULING HEARING ON, AND SETTING OBJECTION DEADLINE FOR, THE SEC’S MOTION TO APPOINT CHAPTER 11 TRUSTEE TOGETHER WITH THE HEARING AND OBJECTION DEADLINE SET ON THE CREDITORS’ COMMITTEE’S MOTION TO APPOINT CHAPTER 11 TRUSTEE

The U.S. Securities and Exchange Commission (the “SEC”) requests the entry of an order scheduling the hearing on, and setting the objection deadline for, the SEC’s Motion for Order Directing the Appointment of a Chapter 11 Trustee [ECF No. 157, the “SEC’s Trustee Motion”] as the same hearing date and objection deadline to be set by the Court on the Creditors’ Committee’s Motion for Order Directing the Appointment of a Chapter 11 Trustee [ECF No. 150, the “Creditors’ Trustee Motion”], and in support, states as follows:

1. On December 28, 2017, the Official Committee of Unsecured Creditors filed the Creditors’ Trustee Motion. The Creditors’ Committee filed their motion on an emergency basis and requested that the Court shorten the notice on the trustee motion such that it may be heard on January 10, 2018 at 1:00 p.m. [ECF No. 151, the “Motion to Shorten”].

2. Today, on January 2, 2018, the SEC filed its trustee motion, which raises many of the same factual issues and legal arguments contained in the Creditors’ Trustee Motion. Thus, as

¹ The last four digits of Woodbridge Group of Companies, LLC’s federal tax identification number are 3606. The mailing address is 14225 Ventura Blvd., Suite 100, Sherman Oaks, CA 91423. The complete list of debtors, the last four digits of their federal tax ID numbers, and their addresses may be obtained on the website of the noticing and claims agent at www.gardencitygroup.com/cases/WGC.

a matter of judicial economy and to avoid unnecessary expense or prejudice to any of the parties in these cases that may result from having the two trustee motions heard separately, the SEC requests that the two trustee motions be heard together. To the extent that the Court agrees to consider the Creditors' Trustee Motion on an expedited basis, the SEC believes that similar grounds exist to shorten the notice period on the SEC's Trustee Motion, such that the two motions may be heard on the same timeline.

3. If the Court grants this Motion and enters an order setting the two trustee motions for hearing on the same date, and ordering the same objection deadline, then the SEC either will work with the Committee on serving a joint notice of the two motions, or will separately serve notice of the hearing date and objection deadline on the SEC's Trustee Motion.

4. A proposed Order is attached to this Motion.

WHEREFORE, the U.S. Securities and Exchange Commission respectfully requests the entry of an Order scheduling the hearing on the SEC's Trustee Motion at the same time as the Creditors' Trustee Motion, and ordering objections to both motions to be filed and served at the same time (as such hearing date and objection deadline will be set by the Court in ruling upon the Committee's Motion to Shorten), and providing such other relief as the Court deems appropriate.

Dated: January 2, 2018

Respectfully Submitted,

/s/ David W. Baddley
David W. Baddley
Admitted Per L.R. 9010-1(e)(1)
Bankruptcy Counsel
Florida Bar No. 0148393
Illinois ARDC 6282466
Telephone: (404) 842-7625
E-mail: baddleyd@sec.gov

Counsel for:

U. S. SECURITIES AND EXCHANGE COMMISSION
Atlanta Regional Office
950 East Paces Ferry Road, N.E.
Suite 900
Atlanta, GA 30326-1382
Telephone: (404) 842-7625

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of January, 2018, a true and correct copy of the foregoing Motion to Schedule Hearing and Set Objection Deadline was furnished to all ECF Participants via Notice of Electronic Filing and additionally was served by Email and Overnight Delivery to:

<p>Samuel A. Newman Oscar Garza Daniel B. Denny Gibson, Dunn & Crutcher, LLP 333 South Grand Avenue Los Angeles, CA 90071-3197 snewman@gibsondunn.com ogarza@gibsondunn.com ddenny@gibsondunn.com</p>	<p>Sean M. Beach Edmon L. Morton Ian J. Bambrick Allison S. Mielke Young Conaway Stargatt & Taylor, LLP Rodney Square 1000 North King Street Wilmington, DE 19801 bankfilings@ycst.com ibambrick@ycst.com amielke@ycst.com</p>
<p>J. Eric Wise Matthew K. Kelsey Matthew P. Porcelli Gibson, Dunn & Crutcher, LLP 200 Park Avenue New York, NY 10166 ewise@gibsondunn.com mkelsey@gibsondunn.com mporcelli@gibsondunn.com</p>	<p>Timothy J. Fox, Jr. Office of the United States Trustee Region 3 – District of Delaware 844 King Street, Suite 2207 Lockbox #35 Wilmington, DE 19801 timothy.fox@usdoj.gov</p>
<p>Richard M. Pachulski James I. Stang Jeffrey Pomerantz 10100 Santa Monica Blvd. 13th Floor Los Angeles, CA 90067-4100 rpachulski@pszjlaw.com jstang@pszjlaw.com jpomerantz@pszjlaw.com</p>	<p>Bradford J. Sandler John A. Morris Colin R. Robinson 919 North Market Street 17th Floor P.O. Box 8705 Wilmington, DE 19801 bsandler@pszjlaw.com jmorris@pszjlaw.com crobinson@pszjlaw.com</p>
<p>Stuart M. Brown DLA Piper LLP (US) 1201 North Market Street Suite 2100 Wilmington, DE 19801-1147 stuart.brown@dlapiper.com</p>	<p>Eric D. Goldberg DLA Piper LLP (US) 2000 Avenue of the Stars Suite 400 North Tower Los Angeles, CA 90067-4704 eric.goldberg@dlapiper.com</p>

<p>Ryan D. O'Quinn DLA Piper LLP (US) 200 South Biscayne Blvd. Suite 2500 Miami, FL 33131 ryan.oquinn@dlapiper.com</p>	<p>William S. Brody Paul S. Arrow BUCHALTER 1000 Wilshire Blvd., Suite 1500 Los Angeles, CA 90017 wbrody@buchalter.com parrow@buchalter.com</p>
<p>John H. Knight Christopher M. De Lillo Richards Layton & Finger, P.A. One Rodney Square 920 North King Street Wilmington, DE 19801 knight@rlf.com delillo@rlf.com</p>	<p>Ronald Richards, Esq. P.O. Box 11480 Beverly Hills, CA 90213 ron@ronaldrichards.com</p>
<p>Andrew D. Warner United States Department of Justice Civil Division 1100 L Street NW Washington, DC 20530 andrew.warner@usdoj.gov</p>	<p>Steven K. Kortanek Patrick A. Jackson Joseph N. Argentina Jr. Drinker, Biddle and Reath, LLP 222 Delaware Ave., Suite 1410 Wilmington, DE 19801 steven.kortanek@dbr.com patrick.jackson@dbr.com joseph.argentina@dbr.com</p>
<p>James H. Millar Drinker, Biddle and Reath, LLP 1177 Avenue of the Americas, 41st Floor New York, NY 10036-2714 james.millar@dbr.com</p>	<p>James G. Lundy Drinker, Biddle and Reath, LLP 191 N. Wacker Dr., Suite 3700 Chicago, IL 60606-1698 james.lundy@dbr.com</p>
<p>Paul J. Pascuzzi Felderstein, Fitzgerald, Willoughby & Pascuzzi 400 Capitol Mall, Suite 1750 Sacramento, CA 95814 ppascuzzi@ffwplaw.com</p>	<p>Milton Bender 1690 Duck Creek Road Ione, CA 95640 miltonbender@volcano.net</p>
<p>Marc Beilinson (email only) Beilinson Advisory Group mbeilinson@beilinsonadvisorygroup.com</p>	<p>Eugene Rubinstein Robert Reed Woodbridge Group of Companies, LLC 14225 Ventura Blvd., Suite 100 Sherman Oaks, CA 91423 eugene@woodbridgecompanies.com rreed@woodbridgecompanies.com</p>

Lawrence Perkins Sierra Constellation Partners, LLC 400 South Hope St., Suite 1050 Los Angeles, CA 90071 lperkins@scpllc.com	Katrina Brountzas (overnight only) GCG, LLC 1985 Marcus Avenue, Suite 200 Lake Success, NY 11042

 /s/ David W. Baddley

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE)	Chapter 11
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WOODBRIIDGE GROUP OF COMPANIES, LLC, <i>et al.</i> , ¹)	Case No. 17-12560-KJC
)	(Jointly Administered)
Debtors.)	
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ORDER SCHEDULING HEARING ON, AND SETTING OBJECTION DEADLINE FOR, THE SEC’S MOTION TO APPOINT CHAPTER 11 TRUSTEE

Upon the motion (the “**Motion**”), filed by the U.S. Securities and Exchange Commission (the “**SEC**”) for entry of an order scheduling the hearing on, and setting the objection deadline for, the SEC’s Motion for Order Directing the Appointment of a Chapter 11 Trustee [ECF No. 157, the “**SEC’s Trustee Motion**”] as the same hearing date and objection deadline set by the Court on the Creditors’ Committee’s Motion for Order Directing the Appointment of a Chapter 11 Trustee [ECF No. 150, the “**Creditors’ Trustee Motion**”], and it appearing that the relief sought in the Motion is appropriate under the circumstances,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted.
2. The hearing on the SEC’s Trustee Motion is scheduled for _____,

2018 at ____:____ a.m./p.m.

¹ The last four digits of Woodbridge Group of Companies, LLC’s federal tax identification number are 3606. The mailing address is 14225 Ventura Blvd., Suite 100, Sherman Oaks, CA 91423. The complete list of debtors, the last four digits of their federal tax ID numbers, and their addresses may be obtained on the website of the noticing and claims agent at www.gardencitygroup.com/cases/WGC.

3. Any objections or responses to the SEC's Trustee Motion must be filed and served so as to be received by no later than _____, 2018 at ____:____ a.m./p.m.

4. Immediately after entry of this Order, counsel for the SEC shall serve a copy of this Order, and notice of the SEC Trustee Motion, on the parties, and in the manner, originally served with the SEC Trustee Motion.

Dated: _____

The Honorable Kevin J. Carey
United States Bankruptcy Judge