

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

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Re: Docket No. 151

**DEBTORS' STATEMENT WITH RESPECT TO THE MOTION OF OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER TO SET  
HEARING DATE ON AND SHORTEN TIME TO OBJECT OR RESPOND TO  
EMERGENCY MOTION OF OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR ENTRY OF AN ORDER  
DIRECTING THE APPOINTMENT OF A CHAPTER 11  
TRUSTEE PURSUANT TO 11 U.S.C. § 1101**

Woodbridge Group of Companies, LLC and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) hereby submit this statement (the “Statement”) with respect to the *Motion of Official Committee of Unsecured Creditors for Entry of an Order To Set Hearing Date on and Shorten Time to Object or Respond to Emergency Motion of Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1101* [Docket No. 151] (the “Motion to Shorten”).<sup>2</sup>

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<sup>1</sup> The last four digits of Woodbridge Group of Companies, LLC’s federal tax identification number are 3603. The mailing address for Woodbridge Group of Companies, LLC is 14225 Ventura Boulevard #100, Sherman Oaks, California 91423. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ noticing and claims agent at [www.gardencitygroup.com/cases/WGC](http://www.gardencitygroup.com/cases/WGC), or by contacting the proposed undersigned counsel for the Debtors.

<sup>2</sup> Capitalized terms not otherwise defined herein shall be given the meanings ascribed to them in the Motion to Shorten.

## **BACKGROUND**

1. On December 4, 2017 (the “Petition Date”), each of the Debtors commenced a voluntary case under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”). Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors are continuing to manage their financial affairs as debtors in possession. These Chapter 11 Cases are being jointly administered for procedural purposes pursuant to Bankruptcy Rule 1015(b).

2. On December 14, 2017, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Committee pursuant to section 1102 of the Bankruptcy Code.

3. Information regarding the Debtors’ history and business operations, capital structure and primary secured indebtedness, and the events leading up to the commencement of the Chapter 11 Cases can be found in the *Declaration of Lawrence R. Perkins in Support of the Debtors’ Chapter 11 Petitions and Requests for First Day Relief* (the “First Day Declaration”), [Docket No. 12], filed on the Petition Date.

4. On December 28, 2017, the Official Committee of Unsecured Creditors (the “Committee”) filed an *Emergency Motion of Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104* (the “Trustee Motion”) [Docket No. 150]. The Committee also filed the Motion to Shorten [Docket No. 151].

## **STATEMENT**

5. The Debtors submit this Statement to inform the Court and parties in interest that, while they dispute the allegations contained in the Trustee Motion, they are electing not to oppose the relief requested in the Motion to Shorten.

6. To be clear, the Trustee Motion entirely misrepresents the actions taken by the Independent Manager and the Debtors' management immediately prior to and since the filing of these cases. There is no basis in fact or law for the relief requested in the Trustee Motion and, in fact, the Debtors believe that the appointment of a chapter 11 trustee will jeopardize both the orderly administration of the Chapter 11 Cases, as well as the Debtors' significant assets. As such, the Debtors intend to vigorously oppose the Trustee Motion.

7. However, the Debtors also believe that prompt resolution of the Trustee Motion (so that all parties in interest can turn their focus to enhancing the Debtors' assets) is in the best interest of the estates. Accordingly, the Debtors do not oppose the Motion to Shorten.

Dated: January 2, 2018  
Wilmington, Delaware

/s/ Edmon L. Morton

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