

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

In re

WOODBIDGE GROUP OF COMPANIES, LLC,  
*et al.*,

Debtors.

Chapter 11

Case No. 17-12560-KJC

**RESPONSE OF G3 GROUP LA, INC. TO DEBTOR'S FIRST OMNIBUS MOTION FOR  
AN ORDER PURSUANT TO 11 U.S.C. §365 (A) AUTHORIZING DEBTORS TO  
ASSUME CERTAIN EXECUTORY CONTRACTS; (B) FIXING CURE AMOUNTS  
WITH RESPECT THERETO; AND (C) GRANTING AUTHORIZATION TO REQUEST  
THE OMNIBUS ASSUMPTION OF THE ASSUME CONTRACTS**

G3 Group LA, Inc. ("G3"), a party to executory contracts with certain of the Debtors, hereby responds to the "DEBTOR'S FIRST OMNIBUS MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. §365 (A) AUTHORIZING DEBTORS TO ASSUME CERTAIN EXECUTORY CONTRACTS; (B) FIXING CURE AMOUNTS WITH RESPECT THERETO; AND (C) GRANTING AUTHORIZATION TO REQUEST THE OMNIBUS ASSUMPTION OF THE ASSUME CONTRACTS" ("Assumption Motion").

By the Assumption Motion, the Debtors propose to assume contracts to which G3 is a party, relating to four separate real estate projects. Exhibit 1 attached to the proposed order, which is attached to the Assumption Motion as Exhibit A, suggests that there are four G3 contracts, one each for four separate projects. There are actually six contracts to which G3 and one of the Debtors are parties, five formally written and one created though written communications. Two of the formally written agreements are tied to one project, that being the one where Debtor Varga Investments, LLC is the owner, and there is one formally written and one informal contract on the Thrasher Avenue project owned by Goose Rocks Investments, LLC. The six contracts are summarized in the following chart.

<b>Owner</b>	<b>Date/Description of Contract</b>	<b>Project Location</b>	<b>Cure Amount</b>
Varga Investments, LLC	December 9, 2016 New Construction	638 Sienna Way Los Angeles, CA 90232	\$459,479.22
Varga Investments, LLC	Site work and Retaining Walls	638 Sienna Way Los Angeles, CA 90232	\$90,449.87
Goose Rocks Investments, LLC	October 20, 2015 New Construction and Site Work	9127 Thrasher Avenue Los Angeles, CA 90069	\$395,029.64 <sup>1</sup>
Goose Rocks Investments, LLC	Fire Remediation	9127 Thrasher Avenue Los Angeles, CA 90069	\$206,784.88
Addison Park Investments, LLC	May 17, 2017 New Construction and Site Work	642 St. Cloud Road Los Angeles, CA 90077	\$1,027,919.72
Arlington Ridge Investments, LLC	May 13, 2016 New Construction and Site Work	1357 Laurel Way Beverly Hills, CA 90210	\$574,327.26
<b>TOTAL</b>			<b>\$2,753,990.59</b>

As the Court may know, G3 is a member of the Creditors' Committee of General Unsecured Creditors ("Committee") established in these cases. The Committee has taken the position that a hearing on the Assumption Motion should be postponed so that the Committee may evaluate the economic merits of the contracts proposed to be assumed and make a recommendation following that review.

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<sup>1</sup> While the Debtors' Assumption Motion and exhibits accurately identify the G3 project locations and amounts owing on three of the four projects, this amount (\$395,029.64) was omitted from the claim amounts owing under one of the two existing Goose Rocks Investments contracts that would have to be paid as part of any cure on assumption.

There is also certain issues that need to be resolved between the owners and G3 with respect to three of the four projects, which resolution will require at a minimum the execution of change orders. Based on discussions to date, G3 has no reason to believe that there are any disputes with the owners with respect to such change orders, but they have yet to be executed by the parties.

While the Committee requests that the hearing on the Assumption Motion be postponed, it conditions the request for a postponement on the payment of the cure amounts owing under the contracts. Such payment, it suggests, can be accomplished by way of a critical vendor motion. While G3 believes that assumption of the contracts to which it is a party is in the best interests of the estates, and that each of the projects are economically viable, G3 supports the position of the Committee and is prepared to delay consideration of the Assumption Motion on condition that the cure amounts be paid either via a critical vendor motion or otherwise.

Dated: January 2, 2018

**SulmeyerKupetz**  
a professional corporation

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