

**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)

Docket Ref. Nos. 890, 1563, 1585, 1586

**CERTIFICATION OF COUNSEL REGARDING AGREED SCHEDULING ORDER**

WHEREAS, on March 1, 2018, Contrarian Funds, LLC (“Contrarian”) filed Claim No. 1216 (the “Contrarian Proof of Claim”);

WHEREAS, on April 3, 2018, Contrarian filed the *Motion of Contrarian Funds, LLC for Authority to Acquire Promissory Notes Against the Debtors* [Docket No. 890] (the “Note Motion”);

WHEREAS, on April 10, 2018, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) served their *Notice of Rule 30(b)(6) Deposition of Contrarian Funds, LLC* (the “Deposition Notice”), and on April 11, 2018, the *Debtors’ First Set of Requests for Production of Documents* (the “Document Requests”);

WHEREAS, on April 16, 2018, the Debtors filed their *Notice of Debtors’ (I) Objection to Proof of Claim No. 1216 Asserted by Putative Transferee Contrarian Funds, LLC Without Prejudice to Right of Putative Transferors Elissa and Joseph Berlinger to Assert Such Claim; and (II) Request for a Limited Waiver of Local Rule 3007-1(f)(iii), to the Extent Such Rule May Apply* [Docket No. 1563] (the “Claim Objection”);

<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 14140 Ventura Blvd #302, 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 undersigned counsel for the Debtors.

WHEREAS, on April 18, 2018, Contrarian filed its *Motion to Quash of Contrarian Funds, LLC* [Docket No. 1585] (the “Motion to Quash”), and *Motion to Shorten Notice With Respect to Motion to Quash of Contrarian Funds, LLC* [Docket No. 1586] (the “Motion to Shorten”);

WHEREAS, on April 19, 2018, the Debtors filed the *Debtors’: (I) Response to Motion to Shorten Notice With Respect to Motion to Quash of Contrarian Funds, LLC; and (II) Cross-Motion for Continuance of Hearing on Motion of Contrarian Funds, LLC for Authority to Acquire Promissory Notes Against the Debtors* [Docket No. 1593] (the “Response and Cross-Motion”), which was joined [Docket Nos. 1598 & 1610] by the Official Committee of Unsecured Creditors (the “UCC”) and the Official Ad Hoc Committee of Unitholders (the “Unitholders’ Committee”);

WHEREAS, on April 23, 2018, the Court held a telephonic hearing on Contrarian’s Motion to Shorten and the Debtors’ Response and Cross-Motion, granting Contrarian’s Motion to Shorten and directing that the Claim Objection be heard on June 5, 2018, concurrently with the Note Motion;

WHEREAS, on April 26, 2018, the Debtors filed their *Objection to Motion to Quash of Contrarian Funds, LLC* [Docket No. 1656], which was joined [Docket Nos. 1657 & 1696] by the UCC and the Unitholders’ Committee;

WHEREAS, on May 1, 2018, the Court held a hearing on Contrarian’s Motion to Quash, and granted in part and denied in part the Motion to Quash;

WHEREAS, on May 7, 2018, Contrarian served its *Responses and Objections to Debtors’ First Set of Requests for Production of Documents* (the “Discovery Responses and Objections”), and produced documents Contrarian believes are consistent with the Court’s ruling on the Motion to Quash (the “Document Production”);

WHEREAS, the Debtors dispute that Contrarian's Discovery Responses and Objections and accompanying Document Production are consistent with the Court's ruling on the Motion to Quash, but – in light of the scheduling agreement embodied herein, under which the Claim Objection will be heard first and may obviate the need for further proceedings in connection with the Note Motion – the Debtors do not believe that the dispute needs to be resolved at this time;

WHEREAS, the Debtors and Contrarian met and conferred and have reached agreement with regard to the scheduling of the Claim Objection and the Note Motion and related discovery, as set forth in the proposed order attached hereto as Exhibit A (the "Proposed Order"). The Debtors submit that the Proposed Order is appropriate and consistent with the Debtors' discussions with Contrarian. Contrarian, the UCC, and the Unitholders' Committee have consented to the entry of the Proposed Order.

Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience without further notice or a hearing.

*[Signature page follows]*

Dated: May 15, 2018  
Wilmington, Delaware

/s/ Allison S. Mielke

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**EXHIBIT A**

**PROPOSED ORDER**

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

In re:

WOODBRIIDGE GROUP OF COMPANIES,  
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Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Docket Ref. Nos. 890, 1563, 1585, 1586

**AGREED SCHEDULING ORDER REGARDING CONTRARIAN'S  
NOTE MOTION AND THE DEBTORS' CLAIM OBJECTION, AND  
ORDER ON MOTION TO SHORTEN AND MOTION TO QUASH**

WHEREAS, on March 1, 2018, Contrarian Funds, LLC ("Contrarian") filed Claim No. 1216 (the "Contrarian Proof of Claim");

WHEREAS, on April 3, 2018, Contrarian filed the *Motion of Contrarian Funds, LLC for Authority to Acquire Promissory Notes Against the Debtors* [Docket No. 890] (the "Note Motion");

WHEREAS, on April 10, 2018, the above-captioned debtors and debtors in possession (collectively, the "Debtors") served their *Notice of Rule 30(b)(6) Deposition of Contrarian Funds, LLC* (the "Deposition Notice"), and on April 11, 2018, the *Debtors' First Set of Requests for Production of Documents* (the "Document Requests");

WHEREAS, on April 16, 2018, the Debtors filed their *Notice of Debtors' (I) Objection to Proof of Claim No. 1216 Asserted by Putative Transferee Contrarian Funds, LLC Without Prejudice to Right of Putative Transferors Elissa and Joseph Berlinger to Assert Such Claim*;

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and (II) Request for a Limited Waiver of Local Rule 3007-1(f)(iii), to the Extent Such Rule May Apply [Docket No. 1563] (the “Claim Objection”);

WHEREAS, on April 18, 2018, Contrarian filed its *Motion to Quash of Contrarian Funds, LLC* [Docket No. 1585] (the “Motion to Quash”), and *Motion to Shorten Notice With Respect to Motion to Quash of Contrarian Funds, LLC* [Docket No. 1586] (the “Motion to Shorten”);

WHEREAS, on April 19, 2018, the Debtors filed the *Debtors’: (I) Response to Motion to Shorten Notice With Respect to Motion to Quash of Contrarian Funds, LLC; and (II) Cross-Motion for Continuance of Hearing on Motion of Contrarian Funds, LLC for Authority to Acquire Promissory Notes Against the Debtors* [Docket No. 1593] (the “Response and Cross-Motion”), which was joined [Docket Nos. 1598 & 1610] by the Official Committee of Unsecured Creditors (the “UCC”) and the Official Ad Hoc Committee of Unitholders (the “Unitholders’ Committee”);

WHEREAS, on April 23, 2018, the Court held a telephonic hearing on Contrarian’s Motion to Shorten and the Debtors’ Response and Cross-Motion, granting Contrarian’s Motion to Shorten and directing that the Claim Objection be heard on June 5, 2018, concurrently with the Note Motion;

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WHEREAS, on May 1, 2018, the Court held a hearing on Contrarian’s Motion to Quash, and granted in part and denied in part the Motion to Quash;

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WHEREAS, the Debtors dispute that Contrarian's Discovery Responses and Objections and accompanying Document Production are consistent with the Court's ruling on the Motion to Quash, but – in light of the scheduling agreement embodied herein, under which the Claim Objection will be heard first and may obviate the need for further proceedings in connection with the Note Motion – the Debtors do not believe that the dispute needs to be resolved at this time;

WHEREAS, the Debtors and Contrarian met and conferred and have reached agreement with regard to the scheduling of the Claim Objection and the Note Motion and discovery in connection therewith;

NOW THEREFORE, IT IS HEREBY ORDERED:

1. The Motion to Shorten is GRANTED as set out on the record of the April 23, 2018 telephonic conference.
2. The Motion to Quash is GRANTED IN PART AND DENIED IN PART as set out on the record of the May 1, 2018 hearing.
3. The hearing on the Debtors' Claim Objection will proceed on June 5, 2018, commencing at 11 o'clock a.m. (Eastern Time), as previously noticed. Contrarian's response to the Claim Objection shall be filed on or before Friday, May 18, 2018, at 4 o'clock p.m. (Eastern Time), and the Debtors' reply in further support of the Claim Objection shall be filed on or before Thursday, May 31, 2018, at 4 o'clock p.m. (Eastern Time).



4. The hearing on Contrarian's Note Motion is adjourned to the July 10, 2018 omnibus hearing, which commences at 11 o'clock a.m. (Eastern Time).

5. Briefing deadlines in connection with the Note Motion and all discovery matters – including the Rule 30(b)(6) deposition under the Debtors' Deposition Notice and the Debtors' dispute regarding Contrarian's Discovery Responses and Objections and accompanying Document Production – will be addressed (if necessary) following the Court's ruling on the Claim Objection, with all parties' rights reserved.

Dated: \_\_\_\_\_, 2018  
Wilmington, Delaware

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KEVIN J. CAREY  
UNITED STATES BANKRUPTCY JUDGE