

4. Commission staff has requested that the Debtors, the Ad Hoc Committees for the Noteholders and the Unitholders, and the Official Committee of Unsecured Creditors (collectively, the “Parties”) consent to extending for 60 days the deadline by which the Commission must file proofs of claim against the First Group Debtors, without prejudice to seeking further extensions.

5. The Parties each have agreed to extend the Current Deadline for the Commission to file proofs of claim against the First Group Debtors to August 3, 2018 (the “Extended Deadline”), without prejudice to the Commission’s right to seek further extensions, and without prejudice to the rights of other Parties in interest to oppose any such extensions (the “Stipulation”).

6. Attached hereto as Exhibit A is a proposed form of order (the “Proposed Order”) approving the Stipulation, a copy of which is attached to the Proposed Order as Exhibit I.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order attached hereto as Exhibit A at the earliest convenience of the Court without further notice or hearing.

Dated: May 17, 2018
Wilmington, Delaware

/s/ Sean M. Beach

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Sean M. Beach (No. 4070)
Edmon L. Morton (No. 3856)
Ian J. Bambrick (No. 5455)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Tel: (302) 571-6600
Fax: (302) 571-1253

Counsel for the Debtors and Debtors in Possession

-and-

KLEE, TUCHIN, BOGDANOFF & STERN LLP

Kenneth N. Klee (admitted pro hac vice)
Michael L. Tuchin (admitted pro hac vice)
David A. Fidler (admitted pro hac vice)
Jonathan M. Weiss (admitted pro hac vice)
1999 Avenue of the Stars
39th Floor
Los Angeles, California 90067
Tel: (310) 407-4000
Fax: (310) 407-9090

*Counsel for the Debtors and
Debtors in Possession*

Exhibit A

Proposed Order

3. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order and the Stipulation.

Dated: Wilmington, Delaware
May ____, 2018

Kevin J. Carey
United States Bankruptcy Judge

Exhibit I

Stipulation

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

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

STIPULATION AND AGREED ORDER EXTENDING BAR DATE FOR U.S. SECURITIES AND EXCHANGE COMMISSION TO FILE PROOFS OF CLAIM

WHEREAS, the U.S. Securities and Exchange Commission (“Commission”) is the federal agency charged with, among other things, the regulation and enforcement of the federal securities laws, and the Commission is a governmental unit within the meaning of the Section 101(27) of the Bankruptcy Code, 11 U.S.C. §101(27);

WHEREAS, on December 4, 2017, certain of the above-captioned debtors and debtors in possession (collectively, the “First Group Debtors”)² commenced these chapter 11 cases by filing voluntary petitions for relief under Chapter 11 of the Bankruptcy Code;

WHEREAS, pursuant to Section 502(b)(9) of the Bankruptcy Code, a claim by a governmental unit is timely filed if it is filed before 180 days after the date of the order for relief, which with respect to the First Group Debtors, is June 4, 2018 (the “Current Deadline”);

¹ 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 Boulevard #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 this information may be obtained on the website of the Debtors’ noticing and claims agent at www.gardencitygroup.com/cases/WGC, or by contacting the undersigned counsel for the Debtors.

² The First Group Debtors consist of all debtors in these cases that filed voluntary petitions for relief on December 4, 2017.

WHEREAS, the Commission has filed a civil enforcement action against the First Group Debtors, and others, in the United States District Court for the Southern District of Florida (Case No. 17-cv-24624), and in that action, the Commission seeks monetary and injunctive relief for alleged violations of the federal securities laws;

WHEREAS, Commission staff has requested that the Debtors, the Ad Hoc Committees for the Noteholders and the Unitholders, and the Official Committee of Unsecured Creditors (collectively, the "Parties") consent to extending for 60 days the deadline by which the Commission must file proofs of claim against the First Group Debtors, without prejudice to seeking further extensions;

WHEREAS, the Parties each have agreed to extend the Current Deadline for the Commission to file proofs of claim against the First Group Debtors to August 3, 2018 (the "Extended Deadline"), without prejudice to the Commission's right to seek further extensions, and without prejudice to the rights of other Parties in interest to oppose any such extensions;

NOW, THEREFORE, the Parties have STIPULATED AND AGREED that the deadline for the Commission to file proofs of claim against the First Group Debtors will be the Extended Deadline, without prejudice to the Commission's right to seek further extensions, and without prejudice to the rights of other Parties in interest to oppose any such extensions.

Dated: May 17, 2018
Wilmington, Delaware

/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

/s/ Sean M. Beach

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Sean M. Beach (No. 4070)
Edmon L. Morton (No. 3856)
Ian J. Bambrick (No. 5455)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Tel: (302) 571-6600
Fax: (302) 571-1253

-and-

KLEE, TUCHIN, BOGDANOFF & STERN LLP

Kenneth N. Klee (admitted pro hac vice)
Michael L. Tuchin (admitted pro hac vice)
David A. Fidler (admitted pro hac vice)
Jonathan M. Weiss (admitted pro hac vice)
1999 Avenue of the Stars
39th Floor
Los Angeles, California 90067
Tel: (310) 407-4000
Fax: (310) 407-9090

Counsel for the Debtors and Debtors in Possession

/s/ Colin R. Robinson

PACHULSKI STANG ZIEHL & JONES LLP

Richard M. Pachulski (CA Bar No. 90073)

James I. Stang (CA Bar No. 94435)

Jeffrey N. Pomerantz (CA Bar No. 143717)

Bradford J. Sandler (DE Bar No. 4142)

Colin R. Robinson (DE Bar No. 5524)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899 (Courier 19801)

Telephone: 302-652-4100

Facsimile: 302-652-4400

E-mail: rpachulski@pszjlaw.com

jstang@pszjlaw.com

jpomerantz@pszjlaw.com

bsandler@pszjlaw.com

crobinson@pszjlaw.com

*Counsel for the Official Committee of Unsecured
Creditors*

/s/ Jeffrey S. Sabin

VENABLE LLP

Jamie L. Edmonson (No. 4247)

Daniel A. O'Brien (No. 4897)

1201 N. Market Street, Suite 1400

Wilmington, Delaware 19801

Telephone: 302-298-3535

Facsimile: 302-298-3550

jledmonson@venable.com

daobrien@venable.com

-and-

Jeffrey S. Sabin (*admitted pro hac vice*)

Carol A. Weiner (*admitted pro hac vice*)

1270 Avenue of the Americas

New York, New York 10020

Telephone: 212-307-5500

Facsimile: 212-307-5598

jssabin@venable.com

cweinerlevy@venable.com

-and-

Andrew J. Currie (*admitted pro hac vice*)
750 E. Pratt St., Suite 900
Baltimore, MD 21202
Telephone: 410-244-7400
Facsimile: 410-244-7742
ajcurrie@venable.com

Counsel for the Unitholder Group

/s/ Steven K. Kortanek

DRINKER BIDDLE & REATH LLP

Steven K. Kortanek (Del. Bar No. 3106)
Patrick A. Jackson (Del. Bar No. 4976)
Joseph N. Argentina, Jr. (Del. Bar No. 5453)
222 Delaware Avenue, Suite 1410
Wilmington, Delaware 19801
Telephone: (302) 467-4200
Facsimile: (302) 467-4201
steven.kortanek@dbr.com
patrick.jackson@dbr.com

-and-

James H. Millar
Michael P. Pompeo
1177 Avenue of the Americas, 41st Floor
New York, New York 10036-2714
Telephone: (212) 248-3140
Facsimile: (212) 248-3141
james.millar@dbr.com
michael.pompeo@dbr.com

-and-

Timothy R. Casey
191 N. Wacker Dr., Ste. 3700
Chicago, Illinois 60606-1698
Telephone: (312) 569-1000
Facsimile: (312) 569-3000
timothy.casey@dbr.com

Counsel for the Noteholder Group