

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

In re:) Chapter 11
)
WOODBRIIDGE GROUP OF COMPANIES,) Case No. 17-12560-(KJC)
LLC, *et al.*,¹)
) Jointly Administered
)
_____ Debtors.)

**MOTION OF LISE LA ROCHELLE, *ET AL.* NOTEHOLDERS
TO SHORTEN NOTICE WITH RESPECT
TO MOTION TO TERMINATE EXCLUSIVITY**

Lise La Rochelle, *et al.* Noteholders (together the “Secured Noteholders”) through undersigned counsel, hereby files this Motion to Shorten Notice (the “Motion to Shorten”), pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure, Del. Bankr. L.R. 9006-1(e) and 11 U.S.C. §§ 102, 105, for an order shortening the notice period with respect to the *Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* (the “Motion to Terminate”) filed contemporaneously herewith. In support of the Motion to Shorten, the Secured Noteholders respectfully state as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157. Venue of these cases and this Motion to Shorten in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

¹The 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. The complete list of 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 noticing and claims agent at www.gardencitygroup.com/cases/wgc.

2. The statutory predicates for the relief sought herein are sections 102(1) and 105(a) of the Bankruptcy Code, as supplemental by Rule 9006 of the Federal Bankruptcy Procedure and Local Rule 9006-1(e).

Relevant Background

3. The relevant factual background is set forth in the Motion to Terminate Exclusivity and the exhibits attached thereto, which are incorporated herein by reference.

Relief Requested

4. The Secured Noteholders respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, shortening the required notice period with respect to the Motion to Terminate by three days, so that the Motion to Terminate may be heard on June 5, 2018, and set the objection and reply deadlines.

Basis for Relief

5. Section 102(1) of the Bankruptcy Code makes clear that the phrase “after notice and a hearing” requires only such notice and opportunity to be heard as may be appropriate under the circumstances.

6. Section 105(a) of the Bankruptcy Code provides that the Court “may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions” of the Bankruptcy Code. 11 U.S.C. § 105(a).

7. Local Bankruptcy Rule 9006-1(c) provides that “all motion papers shall be filed and served in accordance with Local Rule 2002-1(b) at least eighteen (18) days (twenty-one (21) days if service is by first class mail; nineteen (19) days if service is by overnight delivery) prior to the hearing date.” Del. Bankr. L.R. 9006-1(c)(i). Local Bankruptcy Rule 9006-1(e) provides that “no motion will be scheduled on less notice than required by these Local Bankruptcy Rules or the

Fed. R. Bankr. P. except by Order of the Court, on written motion [...] specifying the exigencies justifying shortened notice.” Del. Bankr. L.R. 9006-1(e).

8. The Secured Noteholders request the Motion to Terminate be heard at the June 5, 2018 hearing which is 18 days from today. As set forth in greater detail in the Motion to Terminate, the Secured Noteholders seek to terminate the Debtors exclusivity period so that the Secured Noteholders can explore a plan of reorganization that 1) resolves the issues of priority and seniority of perfected liens; 2) allow for a lump-sum payout to creditors; and 3) encourages third party investors to develop the Debtors existing properties and thereby increase the recovery to creditors. The Secured Noteholders respectfully submit that a hearing on the Motion to Terminate on June 5, 2018 either at the time, or before, the Debtors file their Disclosure Statement and Plan of Reorganization provides the maximum options to the Secured Noteholders and noteholders generally. Additionally, it will help to avoid further expense.

9. The Secured Noteholders respectfully submit that cause exists to hear the Motion to Terminate on shortened notice. The relief requested is not prejudicial to the main parties in the Bankruptcy as they will receive timely notice by electronic mail. The remainder of the parties requesting notice will still have ample time to respond to the motion. The Secured Noteholders respectfully request that the Debtors’ and any other responses be set for May 29, 2018 at 4:00 p.m. and the Secured Noteholders’ Reply be due on June 1, 2018 at noon.

NOTICE

10. The Secured Noteholders served the Motion to Terminate and this Motion to Shorten via (i) electronic mail and first class mail on lead and local counsel to: (a) the Debtors, (b) the Official Committee of Unsecured Creditors, (c) Ad Hoc Noteholders Committee, (d) Ad Hoc Unitholders Committee, and (e) the Office of the United States Trustee (collectively, the

“Notice Parties”), and (ii) first class mail on all other parties that have requested notice in these cases.

WHEREFORE, the Secured Noteholders respectfully request that this Court shorten the notice period with respect to the Motion to Terminate, and grant such other and further relief as is just and proper.

Dated: May 18, 2018
Wilmington, Delaware

THE ROSNER LAW GROUP LLC

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EXHIBIT A

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

In re:)
) Chapter 11
WOODBRIIDGE GROUP OF COMPANIES,)
LLC, <i>et al.</i> , ¹) Case No. 17-12560-(KJC)
)
) Jointly Administered
)
) Re: D.I. __
_____ Debtors.)

ORDER GRANTING MOTION TO SHORTEN TIME

Upon the motion (“Motion to Shorten”) of Lise La Rochelle, *et al.* for entry of an order pursuant to Del. Bankr. LR 9006-1(e), shortening notice to consider the *Motion to Terminate Exclusivity* (the “Motion to Terminate”); and the Court having considered the Motion to Shorten; and the Court finding that the notice proposed by the Motion to Shorten is due, sufficient and adequate under the circumstances; and no other or further notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion to Shorten establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor:

IT IS HEREBY ORDERED THAT:

1. The Motion to Shorten is granted to the extent set forth herein.
2. A hearing on the Motion to Terminate will be held on June 5, 2018 at 11:00 a.m.

(the “Hearing”).

3. Any objection or response to the Motion to Terminate shall be filed with the

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Court by May 29, 2018 at 4:00 p.m., and any Reply shall be filed with the Court by June 1, 2018 at noon.

4. Delaware counsel to the Secured Noteholders shall file and serve a Notice of Hearing on the parties originally served with the Termination Motion in the manner described in the Motion to Shorten.

5. The Court shall retain jurisdiction over any and all issues arising from or related to the implementation and interpretation of this Order.

Dated: _____, 2018
Wilmington, Delaware

United States Bankruptcy Judge