

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

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Ref. Docket No. 1834

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

Woodbridge Group of Companies, LLC and its affiliated debtors and debtors in possession (collectively, the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") hereby oppose the *Motion of Lise La Rochelle, et al. Noteholders to Shorten Notice with Respect to Motion to Terminate Exclusivity* [Docket No. 1834] (the "Motion to Shorten"), in which the moving parties (the "La Rochelle Noteholders") seek: (i) to have their *Motion to Terminate Exclusivity* [Docket No. 1833] (the "Motion to Terminate") heard on shortened notice at the upcoming June 5, 2018 omnibus hearing, rather than at the next regularly scheduled omnibus hearing on July 10, 2018; and (ii) to place the entire burden of their late filing on the Debtors and other stakeholders by asking that the deadline to respond to the Motion to Terminate be set as 4 o'clock p.m. on May 29, 2018, exactly as it would be had the Motion to Terminate been timely filed and noticed for the June 5, 2018 hearing.

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.

1. On March 15, 2018, the Debtors filed their *Motion for Entry of an Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Extending the Exclusive Periods for the Filing of a Chapter 11 Plan and Solicitation of Acceptances Thereof* [Docket No. 754] (the “1121(d) Motion”). No oppositions were filed – despite the fact that: (i) the La Rochelle Noteholders had appeared in these Chapter 11 Cases a month before, *see Notice of Appearance and Demand for Notices and Papers* [Docket No. 610]; (ii) they received notice of the 1121(d) Motion, *see Affidavit of Service* [Docket No. 792]; (iii) the Term Sheet – the centerpiece of the La Rochelle Noteholders’ argument for termination of exclusivity, *see Mot. to Terminate* ¶ 1 – was publicly filed on the docket prior to the deadline to object to the 1121(d) Motion, *see Notice of Submission of Summary Plan Term Sheet [Etc.]* [Docket No. 828]; and (iv) the Term Sheet was duly served on the La Rochelle Noteholders, *see Affidavit of Service* [Docket No. 867].

2. On April 3, 2018, the Court entered its *Order Pursuant to Section 1121(d) of the Bankruptcy Code Extending the Exclusive Periods for the Filing of a Chapter 11 Plan and Solicitation of Acceptances Thereof* [Docket No. 889] (the “1121(d) Order”), which extended the period of time during which the Debtors have the exclusive right to propose and file a chapter 11 plan (the “Plan Period”) through July 2, 2018, and the additional period of time following the expiration of such Plan Period to solicit acceptances of a filed plan without competing plan filings (the “Solicitation Period”) through September 4, 2018.

3. The Debtors are working diligently with the stakeholders in these Chapter 11 Cases to finalize and file a plan within the Plan Period, and nothing has occurred between the Court’s 1121(d) Order last month and the La Rochelle Noteholders’ late-Friday-evening filing of their Motion to Shorten to justify expedited scheduling and consideration of the Motion to Terminate. Nor is there any particular urgency to the relief requested in the Motion to

Terminate, given the La Rochelle Noteholders' admission that *they do not even have a competing plan to file and prosecute at this time*: "The [La Rochelle] Noteholders are prepared to put forth an alternative plan subsequent to the determination of the outstanding adversary proceedings." Mot. to Terminate ¶ 24.²

4. With no plan of their own to put forward prior to the July 2, 2018 expiration of the Plan Period or the July 10, 2018 omnibus hearing, there is simply no basis to override the ordinary scheduling rules and procedures, and the Motion to Shorten should be denied.

Dated: May 21, 2018
Wilmington, Delaware

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² The referenced "outstanding adversary proceedings" [*sic*] is *Lise De La Rochelle, et al. v. Woodbridge Group of Companies, LLC, et al.*, Adv. Proc. No. 18-50371-KJC (Bankr. D. Del.) (the "La Rochelle Adversary Proceeding"), which was filed on March 27, 2018. Aside from a withdrawal of counsel, nothing happened in the La Rochelle Adversary Proceeding between the date it was filed and May 11, 2018, when a summons was finally requested by plaintiffs' counsel. The defendants' deadline to answer or otherwise respond to the adversary complaint is June 11, 2018, and a pretrial conference is set for July 10, 2018. Short of a voluntary dismissal by the plaintiffs, it is inconceivable that the La Rochelle Adversary Proceeding will be resolved prior to the July 2, 2018 expiration of the Plan Period or the July 10, 2018 omnibus hearing.