

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

In re:	:	
	:	Chapter 11
	:	Case No. 17-12560 (KJC)
WOODBRIIDGE GROUP OF COMPANIES LLC, <i>et al.</i> ¹	:	
	:	Jointly Administered
	:	
Debtors.	:	Re: Dkt. Nos. 1834, 1839, 1840

**JOINDER OF THE OFFICAL AD HOC COMMITTEE OF UNITHOLDERS TO (A)
DEBTORS’ OPPOSITION TO MOTION OF LISE LA ROCHELLE, ET AL.
NOTEHOLDERS TO SHORTEN NOTICE WITH RESPECT TO MOTION TO
TERMINATE EXCLUSIVITY, AND (B) THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS’ JOINDER IN SUPPORT THEREOF**

The Official Ad Hoc Committee of Unitholders (the “Unitholders’ Committee”) of Woodbridge Mortgage Investment Fund Entities,² by and through its undersigned counsel, hereby submits this Joinder to (A) the *Debtors’ Opposition to Motion of Lise La Rochelle, et al. Noteholders to Shorten Notice with Respect to Motion to Terminate Exclusivity* [Dkt. No. 1839] (the “Objection”), and (B) the *Official Committee of Unsecured Creditors’ Joinder to the Objection* [Dkt. No. 1840] (the “Committee Joinder”), and, in support thereof, respectfully states as follows:³

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 14225 Ventura Boulevard, #100, Sherman Oaks, California 91423. A complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses may be obtained on the website of the Debtors’ claims and noticing agent at www.gardencitygroup.com/cases/WGC.

² The Funds consist of the following Debtors: (i) Woodbridge Mortgage Investment Fund 1, LLC; (ii) Woodbridge Mortgage Investment Fund 2, LLC; (iii) Woodbridge Mortgage Investment Fund 3, LLC; (iv) Woodbridge Mortgage Investment Fund 3A, LLC; (v) Woodbridge Mortgage Investment Fund 4, LLC; (vi) Woodbridge Commercial Bridge Loan Fund 1, LLC; and (vii) Woodbridge Commercial Bridge Loan Fund 2, LLC.

³ Capitalized terms not defined herein shall have the meanings ascribed to them in the Objection.

1. On May 18, 2018, Lise La Rochelle, *et al.* Noteholders (the “La Rochelle Noteholders”) filed the *Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* [Dkt. No. 1833] (the “Termination Motion”).

2. Contemporaneously therewith, the La Rochelle Noteholders filed the *Motion to Shorten Notice with Respect to Motion to Terminate Exclusivity* [Dkt. No. 1834] (the “Motion to Shorten”) seeking to schedule the Termination Motion to be heard during the previously scheduled omnibus hearing on June 5, 2018, at 11:00 a.m., and to shorten the period for notice of the hearing, with objections, if any, to be filed by 4:00 p.m. on May 29, 2018, and any reply to be filed by June 1, 2018 at 12:00 p.m.

3. On May 21, 2018, the Debtors filed the Objection to the Motion to Shorten.

4. On the same date, the Official Committee of Unsecured Creditors (the “Committee”) filed the Committee Joinder, joining in the Objection.

5. The Unitholders’ Committee agrees with the Debtors and Committee that the La Rochelle Noteholders have failed to demonstrate any exigencies supporting shortened notice with respect to the Termination Motion and that the Motion to Shorten should be denied. For all the reasons set forth in the Objection and Committee Joinder, the Unitholders’ Committee respectfully requests that this Court: (i) deny the Motion to Shorten; and (ii) grant such other and further relief as is just.

[Signature block on following page.]

Dated: May 21, 2018

VENABLE LLP

/s/ Jamie L. Edmonson

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