

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

In re:	) Chapter 11
	)
WOODBIDGE GROUP OF COMPANIES,	) Case No. 17-12560-(KJC)
LLC, et al., <sup>1</sup>	)
	) Jointly Administered
	)
	) <b>Hearing Date: July 10, 2018 at 11:00 a.m. (ET)</b>
Debtors.	) <b>Obj. Deadline: July 3, 2018 at 4:00 p.m. (ET)</b>
	)
	) <b>Re Docket Nos. 1996, 1998, and 2010</b>

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**RESERVATION OF RIGHTS OF ANGELA AND WAYNE JAKOBS,  
MICHAEL AND RONNIE ZUCKERMAN, PAUL COHEN, GAIL P.  
PAYMER REVOCABLE TRUST, CLINTON J. CARROUGHER, ROBERT  
T. CASSIDY, PROVIDENT TRUST GROUP, LLC FBO ROBERT L.  
GROSS, JR. ROTH IRA, JOHN AND ALICIA OHLSSON, ALAN  
GRABISCH, ALBERT OCHS, MARIA RECINE, VIVIAN SHAW,  
DONALD AND PATRICIA KRAHN, MARIA AND NICOLA BALDUCCI,  
AND PHILLIP C. JERZAK TO THE PROPOSED SALE OF 26  
SADDLEHORN COURT, CARBONDALE, CO, 180A SEEBURG CIRCLE,  
CARBONDALE, CO, AND 800 STRADELLA ROAD, LOS ANGELES, CA**

Angela and Wayne Jakobs, Michael and Ronnie Zuckerman, Paul Cohen, Gail P. Paymer Revocable Trust, Clinton J. Carrougner, Robert T. Cassidy, Provident Trust Group, LLC FBO Robert L. Gross, Jr. Roth IRA, John and Alicia Ohlsson, Alan Grabisch, Albert Ochs, Maria Recine, Vivian Shaw, Donald and Patricia Krahn, Maria and Nicola Balducci and Phillip C. Jerzak (together the “Secured Noteholders”) through undersigned counsel, in support of their response and reservation of rights with respect to the Debtors’ motion for entry of an order (i) authorizing the sale of 26 Saddlehorn Court, Carbondale, CO, 180A Seeburg Circle, Carbondale,

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<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 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](http://www.gardencitygroup.com/cases/wgc).

CO, 800 Stradella Road, Los Angeles, CA (the “Property”) property owned by the Debtors free and clear of liens, claims, encumbrances, and other interests; (ii) approving the related purchase agreement; and (iii) granting related relief state as follows:

**The Sale of the Property**

1. The Debtors move pursuant to section 363(f) of the Bankruptcy Code to sell the Property free and clear of liens, claims, encumbrances, and other interests.
2. The Secured Noteholders do not dispute the Debtors’ right to sell the property pursuant to section 363(f) or pay a Broker Fee and other Closing Costs as defined in the motion.

**Use of the Proceeds From the Sale of the Properties**

3. The Debtors plan to pay all proceeds from the sale of the Property (the “Proceeds”) to the general account of the Debtors in accordance with the Final DIP order as defined in the motion.
4. Pursuant to the Final DIP Order, the Debtors will set aside 10% of the Proceeds to provide adequate protection for noteholders such as the Secured Noteholders.
5. The Secured Noteholders accept the Debtors’ decision, as with previous sales, to the use of the proceeds from the sale of the Property to retire third-party secured debt on real property owned by a Debtor entity. However, the Secured Noteholders maintain that the value of the proceeds of each sale that match the value of the Secured Noteholders Notes as listed in Exhibit A are their collateral.

**Secured Noteholders Reservation of Rights**

6. The Secured Noteholders each hold a Promissory Note and Loan Agreement evidencing their security interests. Furthermore, the Secured Noteholders have filed a Proof of Claim reflecting their secured status.

7. The Secured Noteholders assert that they have perfected security interests in the Property. Although consenting to the sale of the Property, the Secured Noteholders reserve all rights to assert that their security interests are valid and that such security interests are properly perfected. Pending resolution of that certain adversary proceeding filed by Lise LaRochelle on March 27, 2018 (Docket 840), the Secured Creditors reserve their rights to seek distribution from the proceeds of sale.

Dated: July 3, 2018  
Wilmington, Delaware

**THE ROSNER LAW GROUP LLC**

/s/ Jason A. Gibson  
Frederick B. Rosner (DE No. 3995)  
Jason A. Gibson (DE No 6091)  
824 N. Market St., Suite 810  
Wilmington, DE 19801  
Tel: (302) 777-1111  
Email: gibson@teamrosner.com

*-and-*

**THE SARACHEK LAW FIRM**

Joseph E. Sarachek (NY Bar No. 2163228)  
101 Park Avenue, 27<sup>th</sup> Floor  
New York, NY 10178  
Telephone: (203) 539-1099  
Facsimile: (646) 861-4950  
Email: joe@saracheklawfirm.com