

**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. 1833

**CERTIFICATION OF COUNSEL REGARDING ORDER DENYING MOTION OF LISE
LA ROCHELLE, ET AL. NOTEHOLDERS TO TERMINATE EXCLUSIVITY**

1. On May 18, 2018, the Lise La Rochelle, *et al.* Noteholders filed the *Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* [Docket No. 1833] (the “Motion”).
2. On June 20, 2018, Woodbridge Group of Companies, LLC and its affiliated debtors and debtors in possession in the above-captioned cases (the “Debtors”) filed the *Debtors’ Opposition to Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* [Docket No. 2015] (the “Objection”).
3. On July 6, 2018, the creditor constituencies filed *The Official Committee of Unsecured Creditors’ Joinder to Debtors’ Opposition to Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* [Docket No. 2101], the *Statement of the Ad Hoc Noteholder Group Regarding the Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* [Docket No. 2102], and the *Joinder of the Unitholders’ Committee to the Ad Hoc*

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 Blvd #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 such 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.

Noteholder Group's Statement Regarding the Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity [Docket No. 2108] (collectively, the "Committee Statements").

4. A hearing was held on July 10, 2018 (the "Hearing") to consider the Motion. At the Hearing, the Court denied the Motion for the reasons set forth on the record at the Hearing and directed counsel to prepare a form of order to reflect the Court's ruling. Attached hereto as Exhibit 1 is a proposed form of order denying the Motion without prejudice (the "Proposed Order").

5. The Proposed Order has been provided to and approved by counsel to the Lise La Rochelle, *et al.* Noteholders, counsel to the Committee, counsel to the Ad Hoc Noteholder Group, and counsel to the Ad Hoc Unitholder Group.

6. The Debtors respectfully request that, unless it has questions, the Court enter the Proposed Order at its earliest convenience.

Dated: July 11, 2018
Wilmington, Delaware

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EXHIBIT A

Proposed Order

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

In re:

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

Debtors.

Chapter 11

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(Jointly Administered)

Ref. Docket No. 1833

**ORDER DENYING MOTION OF LISE LA ROCHELLE, ET AL.
NOTEHOLDERS TO TERMINATE EXCLUSIVITY**

Upon the *Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* (the “Motion”); and upon the *Debtors’ Opposition to Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* [Docket No. 2015] (the “Opposition”); and upon *The Official Committee of Unsecured Creditors’ Joinder to Debtors’ Opposition to Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* [Docket No. 2101], the *Statement of the Ad Hoc Noteholder Group Regarding the Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* [Docket No. 2102], and the *Joinder of the Unitholders’ Committee to the Ad Hoc Noteholder Group’s Statement Regarding the Motion of Lise La Rochelle, et al. Noteholders to Terminate Exclusivity* [Docket No. 2108] (collectively, the “Committee Statements”); and this Court having held a hearing on July 10, 2018 to consider the Motion, the Opposition, and the Committee Statements (the “Hearing”) and considered the arguments

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presented by counsel at the Hearing; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Motion is **DENIED** without prejudice for the reasons stated on the record of the Hearing.

Dated: July ___, 2018
Wilmington, Delaware

KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE