

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

In re:

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

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Ref. Docket Nos. 911 & 1899

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING SECOND
STIPULATION AND AGREED ORDER EXTENDING THE BAR DATE FOR
U.S. SECURITIES AND EXCHANGE COMMISSION TO FILE PROOFS OF CLAIM**

The undersigned hereby certifies as follows:

1. On December 4, 2017, certain of the above-captioned debtors and debtors in possession (collectively, the “First Group Debtors”)² commenced these chapter 11 cases.
2. On either February 9, 2018, March 9, 2018, March 23, 2018 or March 27, 2018, each of the remaining debtors and debtors in possession (collectively, the “Additional Debtors”, and together with the First Group Debtors, the “Debtors”), filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.
3. Pursuant to Section 502(b)(9) of the Bankruptcy Code, a claim by a governmental unit is timely filed if it is filed before 180 days after the date of the order for relief, which with respect to the First Group Debtors, initially was June 4, 2018, and with respect to

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.

² The First Group Debtors consist of all debtors in these cases that filed voluntary petitions for relief on December 4, 2017.

each Additional Debtor, is currently either August 8, 2018, September 5, 2018, September 19, 2018 or September 24, 2018, as the case may be.

4. By *Order Approving Stipulation and Agreed Order Extending Bar Date for U.S. Securities and Exchange Commission to File Proofs of Claim* dated May 18, 2018 [Docket No. 1829], the deadline for the Commission to file proofs of claim against the First Group Debtors was extended to, and currently is, August 3, 2018.

5. The U.S. Securities and Exchange Commission (the “Commission”) has filed a civil enforcement action against the Debtors, and others, in the United States District Court for the Southern District of Florida (Case No. 17-cv-24624), and in that action, the Commission seeks monetary relief for alleged violations of the federal securities laws.

6. Commission staff has requested that the Debtors, the Ad Hoc Committees for the Noteholders and the Unitholders, and the Official Committee of Unsecured Creditors (collectively, the “Parties”) consent to extending to October 26, 2018 the deadline by which the Commission must file proofs of claim against any or all of the Debtors, without prejudice to seeking further extensions.

7. The Parties each have agreed to extend to October 26, 2018 (the “Extended Deadline”) the deadline by which the Commission must file proofs of claim against any or all of the Debtors, without prejudice to the Commission’s right to seek further extensions, and without prejudice to the rights of other Parties in interest to oppose any such extensions (the “Stipulation”).

8. Attached hereto as Exhibit A is a proposed form of order (the “Proposed Order”) approving the Stipulation, a copy of which is attached to the Proposed Order as Exhibit I.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order attached hereto as Exhibit A at the earliest convenience of the Court without further notice or hearing.

Dated: July 31, 2018
Wilmington, Delaware

/s/ Sean M. Beach

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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

Case No. 17-12560 (KJC)

(Jointly Administered)

Ref. Docket Nos. 911, 1899 & ____

**ORDER APPROVING SECOND STIPULATION AND AGREED ORDER
EXTENDING BAR DATE FOR U.S. SECURITIES AND EXCHANGE
COMMISSION TO FILE PROOFS OF CLAIM**

The Court having considered the *Stipulation and Agreed Order Extending Bar Date for U.S. Securities and Exchange Commission to File Proofs of Claim*, a copy of which is annexed hereto as Exhibit I and was submitted under certification of counsel on July 25, 2018 (the “Stipulation”), it is hereby ORDERED that:

1. The Stipulation is approved.
2. The Stipulation is incorporated herein by reference and made a part hereof

as if fully set forth herein.

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.

3. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order and the Stipulation.

Dated: Wilmington, Delaware
_____, 2018

KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE

Exhibit I

Stipulation

**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)

**SECOND STIPULATION AND AGREED ORDER EXTENDING BAR DATE FOR
U.S. SECURITIES AND EXCHANGE COMMISSION TO FILE PROOFS OF CLAIM**

WHEREAS, the U.S. Securities and Exchange Commission (“Commission”) is the federal agency charged with, among other things, the regulation and enforcement of the federal securities laws, and the Commission is a governmental unit within the meaning of the Section 101(27) of the Bankruptcy Code, 11 U.S.C. §101(27);

WHEREAS, on December 4, 2017, certain of the above-captioned debtors and debtors in possession (collectively, the “First Group Debtors”)² commenced these chapter 11 cases by filing voluntary petitions for relief under Chapter 11 of the Bankruptcy Code;

WHEREAS, on either February 9, 2018, March 9, 2018, March 23, 2018 or March 27, 2018, each of the remaining debtors and debtors in possession (collectively, the “Additional Debtors”, and together with the First Group Debtors, the “Debtors”), filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code;

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² The First Group Debtors consist of all debtors in these cases that filed voluntary petitions for relief on December 4, 2017.

WHEREAS, the Commission has filed a civil enforcement action against the Debtors, and others, in the United States District Court for the Southern District of Florida (Case No. 17-cv-24624), and in that action, the Commission seeks monetary relief for alleged violations of the federal securities laws;

WHEREAS, pursuant to Section 502(b)(9) of the Bankruptcy Code, a claim by a governmental unit is timely filed if it is filed before 180 days after the date of the order for relief, which with respect to the First Group Debtors, initially was June 4, 2018, and with respect to each Additional Debtor, is currently either August 8, 2018, September 5, 2018, September 19, 2018 or September 24, 2018, as the case may be;

WHEREAS, by *Order Approving Stipulation and Agreed Order Extending Bar Date for U.S. Securities and Exchange Commission to File Proofs of Claim* dated May 18, 2018 [Docket No. 1829], the deadline for the Commission to file proofs of claim against the First Group Debtors was extended to, and currently is, August 3, 2018;

WHEREAS, Commission staff has requested that the Debtors, the Ad Hoc Committees for the Noteholders and the Unitholders, and the Official Committee of Unsecured Creditors (collectively, the “Parties”) consent to extending to October 26, 2018 the deadline by which the Commission must file proofs of claim against any or all of the Debtors, without prejudice to seeking further extensions;

WHEREAS, the Parties each have agreed to extend to October 26, 2018 (the “Extended Deadline”) the deadline by which the Commission must file proofs of claim against any or all of the Debtors, without prejudice to the Commission’s right to seek further extensions, and without prejudice to the rights of other Parties in interest to oppose any such extensions;

NOW, THEREFORE, the Parties have STIPULATED AND AGREED that the

deadline for the Commission to file proofs of claim against any or all of the Debtors will be the Extended Deadline, without prejudice to the Commission's right to seek further extensions, and without prejudice to the rights of other Parties in interest to oppose any such extensions.

Dated: July 31, 2018
Wilmington, Delaware

/s/ David W. Baddley

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