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

In re:

Chapter 11

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

Case No. 17-12560 (KJC)

Debtors.

(Jointly Administered)

# NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON JANUARY 10, 2018, AT 9:00 A.M. (ET)

#### **WITHDRAWN MATTER**

1. Debtors' First Omnibus Motion for an Order Pursuant to 11 U.S.C. § 365(a) Authorizing Debtors to Assume Certain Executory Contracts; (B) Fixing Cure Amount With Respect Thereto; and (C) Granting Authorization to Request the Omnibus Assumption of the Assumed Contracts by the Motion [Docket No. 106, 12/19/17]

Objection Deadline: January 2, 2018 at 4:00 p.m. (ET), extended for the Committee to

January 3, 2018 at 4:00 p.m. (ET).

## Related Documents:

A. Notice of Withdrawal of Motion [Docket No. 177, 1/2/18]

## Objections/Responses Received:

B. Preliminary Objection of the Official Committee of Unsecured Creditors to, and Motion for Continuance of, the Debtors' First Omnibus Motion for an Order Pursuant to 11 U.S.C. § 365(A) Authorizing the Debtors to Assume Certain Executory Contracts; (B) Fixing Cure Amounts with Respect Thereto; and (C) Granting Authorization to Request the Omnibus Assumption of the Assumed Contracts by this Motion [Docket No. 135, 12/21/17]

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. 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 <a href="https://www.gardencitygroup.com/cases/WGC">www.gardencitygroup.com/cases/WGC</a>, or by contacting the proposed undersigned counsel for the Debtors.

- C. Response of G3 Group LA, Inc. to Debtors' First Omnibus Motion for an Order Pursuant to 11 U.S.C. § 365 (A) Authorizing Debtors to Assume Certain Executory Contracts; (B) Fixing Cure Amount With Respect Thereto; and (C) Granting Authorization to Request the Omnibus Assumption of the Assumed Contracts by the Motion [Docket No. 161, 1/2/18]
- D. Limited Objection of the I-Grace Company to Debtors' First Omnibus Motion for an Order Pursuant to 11 U.S.C. § 365 (A) Authorizing Debtors to Assume Certain Executory Contracts; (B) Fixing Cure Amount With Respect Thereto; and (C) Granting Authorization to Request the Omnibus Assumption of the Assumed Contracts by the Motion [Docket No. 163, 1/2/18]
- E. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]

Status: This matter has been withdrawn.

### **ADJOURNED MATTERS**

2. Debtors' Motion for Interim and Final Orders (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Docket No. 22, 12/4/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the U.S. Trustee,

the Committee, the SEC, the Ad Hoc Noteholders Groups, and the Ad Hoc Unitholders Group (the "Objection Extension Parties") to

January 11, 2018 at 4:00 p.m. (ET)

# Related Documents:

- A. Declaration of Lawrence R. Perkins in Support of the Debtors' Chapter 11 Petitions and Requests for First Day Relief [Docket No. 12, 12/4/17]
- B. Notice of Proposed Draft Senior Secured Debtor in Possession Loan and Security Agreement [Docket No. 38, 12/5/17]
- C. Corrected Interim Order on Emergency Motion for: Entry of Interim Order (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final

- Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Docket No. 59, 12/6/17]
- D. Notice of Entry of Interim DIP Order and Further Interim and Final Hearings on Proposed DIP Financing [Docket No. 62, 12/6/17]
- E. Supplemental Declaration of Lawrence R. Perkins [Docket No. 84, 12/15/17]
- F. Second Interim Order on Emergency Motion for: Entry of Interim Order (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Docket No. 130, 12/21/17]
- G. Notice of Entry of Further Interim DIP Order and Final Hearing on Proposed DIP Financing [D.I. 133, 12/21/17]

- A. United States Trustee's Objection to Entry of Interim Order [Docket No. 87, 12/18/17]
- B. Homeowner's Association at Aspen Glen, Inc.'s Statement and Reservation of Rights with Respect to Debtor in Possession Financing [Docket No. 93, 12/19/17]
- C. Reservation of Rights of the Official Committee of Unsecured Creditors [Docket No. 109, 12/20/17]
- D. Objection of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates to the Debtors' DIP Financing Motion and Proposed Second Interim DIP Order [Docket No. 113, 12/20/17]
- E. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- F. Response and Limited Objection of the Richardson Company to the Debtors' Motion for Interim and Final Orders (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing the Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties;
  - (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing

- Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Re D.I. No. 22] [Docket No. 195, 1/3/18]
- G. Limited Objection by Noteholders Jointly Represented by the Law Office of Curtis A. Hehn to Final Relief Sought in Debtors' Motion for Interim and Final Orders (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Docket No. 217, 1/4/18]

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

3. Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders [Docket No. 85, 12/18/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Objection

Extension Parties and the Debtors to January 11, 2018 at 4:00 p.m.

(ET)

## **Related Documents:**

- A. Joinder of Noteholder Rodney Black to Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders [Docket No. 89, 12/19/17]
- B. Re-Notice of Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders [Docket No. 100, 12/19/17]
- C. Joinder of Additional Noteholders to Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders [Docket No. 198, 1/3/18]

## Objections/Responses Received:

A. Response of the U.S. Securities and Exchange Commission to (I) the Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to

- Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders, and (II) The Joinder of Additional Noteholders to That Motion [Docket No. 213, 1/4/18]
- B. Reply to Response of the U.S. Securities and Exchange Commission to (I) the Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders, and (II) The Joinder of Additional Noteholders to That Motion [Docket No. 231, 1/5/18]
- C. Response by Noteholders Jointly Represented by the Law Office of Curtis A. Hehn to: (I) the Committee' Emergency Motion for the Appointment of a Chapter 11 Trustee; (2) the SEC's Motion for the Appointment of a Chapter 11 Trustee; and €the Ad Hoc Committee of Holders of Promisory Notes for the Appointment of an Official Committee of Noteholders [Docket No. 236, 1/8/18]

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

4. Debtors' Motion for Entry of an Order Pursuant to Section 363 of the Bankruptcy Code Authorizing (I) the Engagement Letter Between the Debtors and SierraConstellation Partners LLC and (II) Debtors' Employment of Lawrence R. Perkins as Chief Restructuring Officer *Nunc Pro Tunc* to the Petition Date [Docket No. 102, 12/19/17]

Objection Deadline: January 2, 2018 at 4:00 p.m. (ET), extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET)

## Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- B. Informal response of the Office of the United States Trustee

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

5. Debtors' Application for Entry of Order Authorizing the Employment and Retention of Homer Bonner Jacobs, PA, as Special Litigation Counsel to the Debtors and Debtors in Possession *Nunc Pro Tunc* to Petition Date [Docket No. 111, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET)

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- B. Informal response of the Office of the United States Trustee

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

6. Debtors' Motion for an Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing the Debtors to Retain Expert Consultant *Nunc Pro Tunc* as of December 18, 2017 [Docket No. 116, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET)

#### Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- B. Informal response of the Office of the United States Trustee

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

7. Debtors' Motion for Entry of an Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business [Docket No. 117, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET)

#### **Related Documents:**

A. Notice of Supplement to List of Ordinary Course Professionals [Docket No. 208, 1/3/18]

## Objections/Responses Received:

B. Informal response of the Office of the United States Trustee

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

8. Debtors' Application for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Counsel for the Debtors, Effective as of the Petition Date [Docket No. 119, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET)

## Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- B. Informal response of the Office of the United States Trustee

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

9. Debtors' Application for an Order Authorizing the Employment and Retention of Gibson, Dunn & Crutcher LLP as General Bankruptcy and Restructuring Co-Counsel for the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date [Docket No. 122, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET)

## **Related Documents:**

A. Supplemental Declaration of Samuel A. Newman in Support of the Debtors' Application for an Order Authorizing the Employment and Retention of Gibson, Dunn & Crutcher LLP as General Bankruptcy and Restructuring Co-Counsel for the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date [Docket No. 214, 1/3/18]

# Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- B. Informal response of the Office of the United States Trustee

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

10. Application of the Debtors for Order (I) Authorizing Retention and Employment of Moelis & Company LLC as Investment Banker to the Debtors *Nunc Pro Tunc* to December 12, 2017 Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 [Docket No. 123, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET)

#### **Related Documents:**

A. Supplemental Declaration of William Derrough in Support of Application of the Debtors for Order (I) Authorizing Retention and Employment of Moelis & Company LLC as Investment Banker to the Debtors *Nunc Pro Tunc* to December 12, 2017 Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 [Docket No. 152, 12/29/17]

#### Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- B. Informal response of the Office of the United States Trustee

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

11. Official Committee of Unsecured Creditors' Application for Order, Pursuant to 11 U.S.C. §§ 328, and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to December 14, 2017 [Docket No. 137, 12/22/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Objection Extension Parties and the Debtors to January 11, 2018 at 4:00 p.m. (ET)

#### Objections/Responses Received:

A. Informal response of the Office of the United States Trustee

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

12. Official Committee of Unsecured Creditors' Application Pursuant to Fed. R. Bankr. P. 2014(a) for Order Under Section 1103 of the Bankruptcy Code Authorizing the Employment and Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors [Docket No. 138, 12/22/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Objection Extension Parties and the Debtors to January 11, 2018 at 4:00 p.m. (ET)

## Objections/Responses Received:

A. Informal response of the Office of the United States Trustee

Status: This matter will be adjourned to January 18, 2018 at 10:00 a.m. (ET).

## UNCONTESTED MATTERS WITH CERTIFICATION OF COUNSEL

13. Debtors' Motion for Entry of Interim and Final Orders (A) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Service; (B) Approving the Debtors Proposed Adequate Assurance of Payment for Postpetition Services; and (C) Establishing Procedures for Resolving Requests for Additional Adequate Assurance of Payment [Docket No. 7, 12/4/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET)

#### **Related Documents:**

- A. Interim Order, (A) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Service; (B) Approving the Debtors' Proposed Adequate Assurance of Payment for Postpetition Services; and (C) Establishing Procedures for Resolving Requests for Additional Adequate Assurance of Payment [Docket No. 49, 12/5/17]
- B. Omnibus Notice of Pleadings and Hearing Thereon [Docket No. 63, 12/6/17]
- C. Certification of Counsel Regarding Final Order (A) Prohibiting Utility
  Providers From Altering, Refusing, or Discontinuing Service;
   (B) Approving the Debtors' Proposed Adequate Assurance of Payment
  for Postpetition Services; and (C) Establishing Procedures for Resolving
  Requests for Additional Adequate Assurance of Payment [Docket No.
  220, 1/5/18]

## Objections/Responses Received:

D. Informal response of the Official Committee of Unsecured Creditors

Status: A certification of counsel has been filed. No hearing is required.

14. Debtors' Motion for an Order Extending the Time Within Which the Debtors Must File Their Schedules of Assets and Liabilities and Statement of Financial Affairs [Docket No. 80, 12/14/17]

Objection Deadline: December 29, 2017 at 4:00 p.m. (ET), extended for the Committee to January 3, 2018 at 4:00 p.m. (ET)

#### **Related Documents:**

A. Certification of Counsel Regarding Debtors' Motion for an Order Extending the Time Within Which the Debtors Must File Their Schedules of Assets and Liabilities and Statement of Financial Affairs [Docket No. 221, 1/5/18]

## Objections/Responses Received:

B. Informal response of the Office of the United States Trustee

<u>Status</u>: A certification of counsel has been filed. No hearing is required.

15. Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 81, 12/14/17]

Objection Deadline: December 29, 2017 at 4:00 p.m. (ET), extended for the Committee to January 3, 2018 at 4:00 p.m. (ET)

## **Related Documents:**

A. Certification of Counsel Regarding Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 219, 1/5/18]

# Objections/Responses Received:

- B. Informal response of the Office of the United States Trustee
- C. Informal response of the Official Committee of Unsecured Creditors

Status: A certification of counsel has been filed. No hearing is required.

16. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Garden City Group, LLC as Administrative Advisor for the Debtors and Debtors in Possession Pursuant to 11 U.S.C. §§ 327(a) and 330, Nunc Pro Tunc to the Petition Date [Docket No. 103, 12/19/17]

Objection Deadline: January 2, 2018 at 4:00 p.m. (ET), extended for the Committee to January 3, 2018 at 4:00 p.m. (ET)

#### **Related Documents:**

A. Certification of Counsel Regarding Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Garden City Group, LLC as Administrative Advisor for the Debtors and Debtors in Possession Pursuant to 11 U.S.C. §§ 327(a) and 330, Nunc Pro Tunc to the Petition Date [Docket No. 225, 1/5/18]

#### Objections/Responses Received:

- B. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- C. Informal response of the Office of the United States Trustee

Status: A certification of counsel has been filed. No hearing is required.

17. Debtors' Motion Pursuant to 11 U.S.C. § 105(a), Fed. R. Bankr. P. 2002, 9007, and 9036, and Local Rules 2002-1 and 5005-4 for Entry of an Order Approving the Form and Manner of Electronic Noticing Procedures in the Debtors' Chapter 11 Cases [Docket No. 120, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET)

#### **Related Documents:**

A. Certification of Counsel Regarding Order Approving the Form and Manner of Electronic Noticing Procedures in the Debtors' Chapter 11 Cases [Docket No. 222, 1/5/18]

#### Objections/Responses Received:

B. Informal response of the Office of the United States Trustee

Status: A certification of counsel has been filed. No hearing is required.

#### UNCONTESTED MATTERS GOING FORWARD

18. Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105(a), 363(b), 503(b)(9), 1107(a), and 1108 of the Bankruptcy Code, Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors; and Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related to the Foregoing [Docket No. 6, 12/4/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET)

#### **Related Documents:**

- A. Interim Order, Pursuant to Sections 105(a), 363(b), 503(b)(9), 1107(a), and 1108 of the Bankruptcy Code, Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors, and Authorizing Banks to Honor Process Checks and Electronic Transfer Requests Related to the Foregoing [Docket No. 48, 12/5/17]
- B. Omnibus Notice of Pleadings and Hearing Thereon [Docket No. 63, 12/6/17]

# Objections/Responses Received:

A. Informal response of the Official Committee of Unsecured Creditors

<u>Status</u>: The Debtors anticipate filing a revised proposed order under Certification of Counsel prior to the hearing. This matter is currently going forward.

## **CONTESTED MATTERS GOING FORWARD**

19. Emergency Motion of Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104 [Docket No. 150, 12/28/17]

Objection Deadline: January 8, 2018 at 12:00 p.m. (ET)

#### Related Documents:

- A. Order Fixing Hearing Date and Shortening Time to Object or Respond to Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104 [Docket No. 170, 1/2/18
- B. Notice of Hearing [Docket No. 173, 1/2/18]

- A. Response by Noteholders Jointly Represented by the Law Office of Curtis A. Hehn to: (1) the Committee' Emergency Motion for the Appointment of a Chapter 11 Trustee; (2) the SEC's Motion for the Appointment of a Chapter 11 Trustee; and (3) the Ad Hoc Committee of Holders of Promisory Notes for the Appointment of an Official Committee of Noteholders [Docket No. 236, 1/8/18]
- B. United States Trustee's Omnibus Response in Support of Official Committee of Unsecured Creditors and Securities and Exchange Commission Motions for the Appointment of a Chapter 11 Trustee [Docket No. 237, 1/8/18]
- C. Response of 805 Nimes Place, LLC to Motions for Appointment of Chapter 11 Trustee [Docket No. 238, 1/8/18]
- D. Opposition of the Joinder Noteholder Group to (1) Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to U.S.C. § 1104 and (2) Motion by the U.S. Securities and Exchange Commission for Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 239, 1/8/18]
- E. Debtors' Objection to Motions of (I) Official Committee of Unsecured Creditors and (Ii) the U.S. Securities and Exchange Commission for Entry of an Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 240, 1/8/18]
- F. Omnibus Objection of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates to the Pending Motions for Appointment of a Chapter 11 Trustee [Docket No. 245, 1/8/18]

Status: This matter will be going forward.

20. Motion by the U.S. Securities and Exchange Commission for Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 157, 1/2/18]

Objection Deadline: January 8, 2018 at 12:00 p.m. (ET)

#### **Related Documents:**

- A. Order Scheduling Hearing on, and Setting Objection Deadline for, The SEC's Motion to Appoint Chapter 11 Trustee [Docket No. 171, 1/2/18]
- B. Notice of Motion [Docket No. 174, 1/2/18]

- A. Response by Noteholders Jointly Represented by the Law Office of Curtis A. Hehn to: (I) the Committee' Emergency Motion for the Appointment of a Chapter 11 Trustee; (2) the SEC's Motion for the Appointment of a Chapter 11 Trustee; and €the Ad Hoc Committee of Holders of Promisory Notes for the Appointment of an Official Committee of Noteholders [Docket No. 236, 1/8/18] (See matter 19 (A))
- B. United States Trustee's Omnibus Response in Support of Official Committee of Unsecured Creditors and Securities and Exchange Commission Motions for the Appointment of a Chapter 11 Trustee [Docket No. 237, 1/8/18] (See matter 19 (B))
- C. Response of 805 Nimes Place, LLC to Motions for Appointment of Chapter 11 Trustee [Docket No. 238, 1/8/18] (*See matter 19 (C*))
- D. Opposition of the Joinder Noteholder Group to (1) Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to U.S.C. § 1104 and (2) Motion by the U.S. Securities and Exchange Commission for Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 239, 1/8/18] (See matter 19 (D))
- E. Debtors' Objection to Motions of (I) Official Committee of Unsecured Creditors and (Ii) the U.S. Securities and Exchange Commission for Entry of an Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 240, 1/8/18] (See matter 19 (E))
- F. Omnibus Objection of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates to the Pending Motions for Appointment of a Chapter 11 Trustee [Docket No. 245, 1/8/18] (*See matter 19 (F)*)

Status: This matter will be going forward.

Dated: Wilmington, Delaware

January 8, 2018

#### /s/ Ian J. Bambrick

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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Proposed Counsel to the Debtors and Debtors in Possession