

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

In re:)	Chapter 11
)	
WOODBRIIDGE GROUP OF COMPANIES,)	Case No. 17-12560 (KJC)
LLC, <i>et al.</i> , ¹)	
)	(Jointly Administered)
Debtors.)	
)	Hearing Date: 10/24/18 at 10:00 am
)	Objection Date: 10/9/18 at 4:00 p.m.
)	Related Docket No. 2397

LIMITED OBJECTION TO CONFIRMATION OF PLAN

Comerica Bank (“Comerica”), by their undersigned attorneys, hereby files this limited objection (the “Objection”) to confirmation of the Debtors’ First Amended Joint Chapter 11 Plan of Liquidation dated August 22, 2018 [ECF No. 2397] (the “Plan”)² as follows:

1. The Plan appears to affect the ability of claimants such as Comerica to assert any Secured Claim or defense to any claim or cause of action that may be asserted by the Liquidation Trust or otherwise based on setoff, recoupment or contribution against the Debtors, their estates, the Liquidation Trust and the Released Parties. *See, e.g.*, Plan §5.4.3 (Vesting “Liquidation Trust Assets free and clear of all Claims, Liens, or interests”). Such provisions are not permitted. *See Folger Adam Sec., Inc. v. DeMatteis/MacGregor, JV*, 209 F.3d 252 (3d Cir. 2000).

[Conclusion on following page]

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 (the “Debtors”), 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 for the Debtors.

² Capitalized terms used but not defined herein shall have the meanings ascribed to those terms in the Plan.

Wherefore, for the foregoing reasons, Comerica respectfully requests that the Court sustain the Objection, and grant such further relief as is just and necessary.

Dated: October 8, 2018
Wilmington, Delaware

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CERTIFICATE OF SERVICE

I, F. Troupe Mickler IV, hereby certify that on October 8, 2018, I caused one copy of the foregoing document to be served upon the parties on the attached service list via U.S. Mail, postage prepaid and Electronic Mail.

/s/ F. Troupe Mickler IV

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