

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

In re

WOODBIDGE GROUP OF COMPANIES, LLC,
et al.,

Debtors.

Chapter 11

Case No. 17-12560-KJC

**CONDITIONAL OBJECTION OF G3 GROUP LA, INC. TO ASSUMPTION AND
OBJECTION TO CURE AMOUNTS PROPOSED IN PLAN SUPPLEMENT TO
DEBTOR'S FIRST AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION OF
WOODBIDGE GROUP OF COMPANIES, LLC AND ITS AFFILIATED DEBTORS**

G3 Group LA, Inc. ("G3"), a party to executory contracts with certain of the Debtors, hereby submits this conditional objection to assumption of contracts to which it is a party and further objects to certain cure amounts set forth in the Plan Supplement [Docket no. 2657] to the Debtor's "FIRST AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION OF WOODBRIDGE GROUP OF COMPANIES, LLC AND ITS AFFILIATED DEBTORS" [Docket no. 2398]("Plan").

I.

Background

G3 is a party to six contracts with one of the Debtors parties, five formally written and one created though written communications. Two of the formally written agreements are tied to one project, that being the one where Debtor Varga Investments, LLC is the owner, and there is one formally written and one informal contract on the Thrasher Avenue project owned by Goose Rocks Investments, LLC. The six contracts are summarized in the following chart.

Owner/Debtor	Description of Contract¹	Project Location
Varga Investments, LLC	General Contractor Agreement (Phase II)	638 Sienna Way Los Angeles, CA 90232
Varga Investments, LLC	General Contractor Agreement (Phase III)	638 Sienna Way Los Angeles, CA 90232
Varga Investments, LLC	General Contractor Agreement for Shoring Services	638 Sienna Way Los Angeles, CA 90232
Goose Rocks Investments, LLC	General Contractor Agreement and Fire Remediation	9127 Thrasher Avenue Los Angeles, CA 90069
Addison Park Investments, LLC	General Contractor Agreement	642 St. Cloud Road Los Angeles, CA 90077
Arlington Ridge Investments, LLC	General Contractor Agreement	1357 Laurel Way Beverly Hills, CA 90210

Pursuant to the Plan Supplement, Debtors have proposed to assume all G3 contracts, but has listed the cure amounts in each instance as "\$0.00." G3 has since been informed that the Debtor Varga Investments, LLC has elected to terminate the Phase III General Contractor Agreement for convenience, which triggers a fee upon termination.

¹ References coincide with those set forth in the Plan Supplement.

II.**Objection**

G3 does not object to the assumption of the above described contracts, provided Debtors comply with the provisions of 11 U.S.C. §365. It does however dispute the contention that the cure amounts are zero. G3 has been in negotiations with the Debtors' representatives and ultimately there may be no dispute as to the amounts set forth hereinbelow. The amounts to cure the Debtors' obligations under the following referenced contracts are:

Owner	Date/Description of Contract	Project Location	Cure Amount
Varga Investments, LLC	General Contractor Agreement (Phase III)	638 Sienna Way Los Angeles, CA 90232	\$285,000 ²
Goose Rocks Investments, LLC	General Contractor Agreement and Fire Remediation	9127 Thrasher Avenue Los Angeles, CA 90069	\$16,693.91
Arlington Ridge Investments, LLC	General Contractor Agreement	1357 Laurel Way Beverly Hills, CA 90210	\$175,889.75

As all parties know, §365(b)(1) requires that, as a condition to assumption, Debtors cure or provide adequate assurance of a prompt cure of any defaults under the contract to be assumed. To the extent Debtors agree with the above numbers and promptly pay such amounts or provide adequate assurance of prompt payment, G3 has no objection to assumption. In the absence thereof, G3 must object.

² This amount arises from Varga's election to terminate for convenience.

G3 further reserves all rights to supplement or correct the cure amounts to the extent information becomes available that demonstrates that the above numbers are under or overstated.

WHEREFORE, G3 respectfully submits this conditional objection to assumption and its objection to the stated cure amounts to the extent they are deemed to be other than as set forth hereinabove.

Dated: October 8, 2018

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