

**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 Nos. 2709, 2710 & 2797

CERTIFICATION OF COUNSEL REGARDING ORDER (I) AUTHORIZING THE SALE OF LOTS 1, 2, AND 3 BOWLES GULCH, CARBONDALE, COLORADO PROPERTY OWNED BY THE DEBTORS FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS; (II) APPROVING THE RELATED PURCHASE AGREEMENT; AND (III) GRANTING RELATED RELIEF

1. The undersigned hereby certifies that, on October 2, 2018, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Debtors’ Motion for Entry of an Order (I) Authorizing the Sale of Lots 1, 2, and 3 Bowles Gulch, Carbondale, Colorado Property Owned by the Debtors Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (II) Approving the Related Purchase Agreement; and (III) Granting Related Relief* [Docket No. 2709] (the “Motion”). Attached as Exhibit A to the Motion was a proposed form of order (the “Proposed Order”).

2. Pursuant to the Notice of Motion, the deadline to file objections or responses to the Motion was October 16, 2018, at 4:00 p.m. (ET) (the “Objection Deadline”). On October 16, 2018, the Ottaviano Living Trust (the “Respondent”) filed a reservation of rights to the Motion

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 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.

[Docket No. 2797] (the “ROR”). No other objections or responses were received on or before the Objection Deadline.

3. The ROR provides that the Respondents “consent[] to the sale of the Property.” ROR ¶ 7. The Debtors conferred with counsel to the Respondents, who further confirmed that the Respondents do not request any changes to the Proposed Order or oppose entry of the Proposed Order.

4. The Debtors submit that the Proposed Order is appropriate and consistent with the relief requested in the Motion and the Debtors’ discussions with the Respondents, and that entry of the Proposed Order is in the best interests of the Debtor, their estates, and their creditors.

Dated: October 17, 2018
Wilmington, Delaware

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