

**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, et al., ¹)
) Jointly Administered
)
) Hearing Date: Oct. 24, 2018 at 10:00 a.m. (ET)
Debtors.)
) Re Docket No. 2830

**OBJECTION TO MOTION FOR ENTRY OF AN ORDER
AUTHORIZING THE DEBTORS TO FILE UNDER SEAL EXHIBIT
1 TO THE DECLARATION OF FREDERICK CHIN IN SUPPORT
OF CONFIRMATION OF THE FIRST AMENDED JOINT CHAPTER 11
PLAN OF LIQUIDATION OF WOODBRIDGE GROUP OF COMPANIES, LLC**

Lise La Rochelle *et al.* and other parties objecting to confirmation of the Debtors’ Chapter 11 Plan who are clients of the Sarachek Law Firm² (the “Dissenting Creditors”), by and through their undersigned counsel, hereby respond to the Debtors’ *Motion for Entry of an Order Authorizing the Debtors to File Under Seal Exhibit 1 to the Declaration of Frederick Chin in Support of Confirmation of the First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC* [D.I. 2830] (the “Motion”) as follows:

1. The Debtors’ filed the Motion on October 19, 2018. The Motion seeks to file under seal the Debtors’ analysis of the valuations of their properties. The Dissenting Creditors believe it is essential to review this information because it is relevant to understanding the values of the

¹The 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. The complete list of 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 noticing and claims agent at www.gardencitygroup.com/cases/wgc.

² All of the Objecting parties are fully listed in the 2019 Statement filed The Sarachek Law Firm on August 21, 2018 [Docket No. 2385]

properties for purposes of asserting our secured position. The information is also necessary for any party that may wish to examine the witness.

2. Counsel for the Dissenting Creditors agree to maintain confidentiality.

Dated: October 24, 2018
Wilmington, Delaware

THE ROSNER LAW GROUP LLC

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-and-

THE SARACHEK LAW FIRM

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