

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

In re:)	
)	Chapter 11
WOODBRIIDGE GROUP OF COMPANIES,)	
LLC, et al., ¹)	Case No. 17-12560-(KJC)
)	
)	Jointly Administered
)	
)	Re: D.I. 2901, 2903, 2957 & 2958
_____ Debtors.)	

**MOTION OF LISE LA ROCHELLE AND OTHER NOTEHOLDERS
TO SHORTEN NOTICE WITH RESPECT
TO MOTION FOR STAY PENDING APPEAL**

Lise La Rochelle and other noteholders (collectively, the “Moving Noteholders”) through undersigned counsel, hereby file this Motion to Shorten Notice (the “Motion to Shorten”), pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure, Del. Bankr. L.R. 9006-l(e) and 11 U.S.C. §§ 102, 105, for an order shortening the notice period with respect to the *Motion for a Stay Pending Appeal of the Order Confirming Debtors’ First Amended Joint Chapter 11 Plan of Liquidation* (the “Motion for Stay”) filed contemporaneously herewith. In support of the Motion to Shorten, the Moving Noteholders respectfully state as follows:

Jurisdiction and Venue

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157. Venue of these cases and this Motion to Shorten in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

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. The statutory predicates for the relief sought herein are sections 102(1) and 105(a) of the Bankruptcy Code, as supplemental by Rule 8005 of the Federal Bankruptcy Procedure.

Relevant Background

3. The relevant factual background is set forth in the Motion for Stay which is incorporated herein by reference.

Relief Requested

4. The Moving Noteholders respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, shortening the required notice period with respect to the Motion for Stay by ten days as to those parties that will receive notice by first class united states mail, so that the Motion to Stay may be heard on November 20, 2018, and set the objection and reply deadlines. The United States Trustee as well as local counsel for the Debtor, Unsecured Creditors Committee, Ad Hoc Noteholders Committee and Ad Hoc Unitholders Committee will be served by electronic mail, so notice will be reduced by 7 days.

Basis for Relief Requested

5. Section 102(1) of the Bankruptcy Code makes clear that the phrase “after notice and a hearing” requires only such notice and opportunity to be heard as may be appropriate under the circumstances.

6. Section 105(a) of the Bankruptcy Code provides that the Court “may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions” of the Bankruptcy Code. 11 U.S.C. § 105(a).

7. Local Bankruptcy Rule 9006-1(c) provides that “all motion papers shall be filed and served in accordance with Local Rule 2002-1(b) at least eighteen (18) days (twenty-one (21) days if service is by first class mail; nineteen (19) days if service is by overnight delivery) prior to

the hearing date.” Del. Bankr. L.R. 9006-1(c)(i). Local Bankruptcy Rule 9006-1(e) provides that “no motion will be scheduled on less notice than required by these Local Bankruptcy Rules or the Fed. R. Bankr. P. except by Order of the Court, on written motion [...] specifying the exigencies justifying shortened notice.” Del. Bankr. L.R. 9006-1(e).

8. The Moving Noteholders request the Motion for Stay be heard at the November 20, 2018 hearing which is 11 days from today. As set forth in greater detail in the Motion for Stay, the Moving Noteholders seek a stay pending appeal of this Court’s order Confirming the Debtors’ Amended Joint Plan of Liquidation as to the extinguishing of intercompany liens and substantive consolidation. The Moving Noteholders respectfully request that a hearing on the Motion for Stay on November 20, 2018.

9. The Moving Noteholders respectfully submit that cause exists to hear the Motion for Stay on shortened notice. Confirmation has already taken place on October 24, 2018 and the Debtors are preparing to consummate the plan of reorganization. Rather than wasting additional resources of the estate, a hearing on the motion for a stay on shortened notice will conserve resources. By hearing this matter on November 20th, this Court can provide direction to all parties in interest rather than leave the question undecided until the December 19th hearing date. The main parties requesting notice will still have ample time to respond to the motion; all parties extensively prepared for confirmation and are ready to deal with these issues. The Moving Noteholders respectfully request that the Debtors’ response, as well as the response of other interested parties be set for November 19, 2018 at 4:00 p.m.

Dated: November 9, 2018
Wilmington, Delaware

THE ROSNER LAW GROUP LLC

/s/ Jason A. Gibson
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-and-

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EXHIBIT A

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

In re:)	
)	Chapter 11
WOODBRIIDGE GROUP OF COMPANIES,)	
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)	
)	Jointly Administered
)	
_____ Debtors.)	Re: D.I. ____

ORDER GRANTING MOTION TO SHORTEN TIME

Upon the motion (“Motion to Shorten”) of Lise La Rochelle and other noteholders for entry of an order pursuant to Del. Bankr. LR 9006-1(e), shortening notice to consider the *Motion For A Stay Pending Appeal of the Order Confirming Debtors’ First Amended Joint Chapter 11 Plan of Liquidation* (the “Motion For Stay”); and the Court having considered the Motion to Shorten; and the Court finding that the notice proposed by the Motion to Shorten is due, sufficient and adequate under the circumstances; and no other or further notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion to Shorten establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor:

IT IS HEREBY ORDERED THAT:

1. The Motion to Shorten is granted to the extent set forth herein.
2. A hearing on the Motion for Stay will be held on November 20, 2018 at 2:00 p.m. (the “Hearing”).
3. Any objection or response to the Motion for Stay shall be filed with the Court by

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November 19, 2018 at 4:00 p.m.

4. Delaware counsel to the Moving Noteholders shall file and serve a Notice of Hearing on the parties originally served with the Motion for Stay in the manner described in the Motion to Shorten.

5. The Court shall retain jurisdiction over any and all issues arising from or related to the implementation and interpretation of this Order.

Dated: November ____, 2018

United States Bankruptcy Judge