

**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)

Re: Docket Nos. 2958, 2959, 2965 and 3033

Hearing Date: November 20, 2018 at 2:00 p.m. (ET)

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS’
JOINER TO DEBTORS’ OPPOSITION TO MOTION FOR STAY
PENDING APPEAL OF THE CONFIRMATION ORDER**

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned cases, through the Committee’s undersigned counsel, hereby joins and files this statement in support of the *Debtors’ Opposition to Motion for Stay Pending Appeal of the Confirmation Order* [D.I. 3033] (the “Objection”) ² with the United States Bankruptcy Court for the District of Delaware (the “Court”). The Committee joins in the Objection for the reasons set forth therein, and for the reasons set forth below.

Background

1. On November 9, 2018, Lisa La Rochelle, *et al.* Noteholders (“Sarachek Noteholders”) filed the *Motion of Lise La Rochelle and Other Noteholders for a Stay Pending Appeal of the Order Confirming Debtors’ First Amended Joint Chapter 11 Plan of Liquidation* [D.I. 2958] (the “Stay Motion”) with the Court.

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 counsel for the Debtors.

² Capitalized terms not defined herein shall have the meaning as provided in the Objection.

2. Contemporaneously therewith, the Sarachek Noteholders filed the *Motion to Shorten Notice with Respect to Motion of Lisa La Rochelle and Other Noteholders for a Stay Pending Appeal of the Order Confirming Debtors' First Amended Joint Chapter 11 Plan of Liquidation* [D.I. 2959] (the "Motion to Shorten"). The Motion to Shorten was granted and the hearing on the Stay Motion has been scheduled to be heard on November 20, 2018 at 10:00 a.m. with objections due November 19, 2018. *See* [D.I. 2965].

3. On November 19, 2018, the Debtors filed the Objection.

Joinder

4. The Committee joins in the Objection and urges the Court to deny the Stay Motion.

5. An an initial matter, the Stay Motion is ill-conceived. It seeks a stay pending appeal as to the Confirmation Order sections approving substantive consolidation and extinguishment of intercompany liens. As the Objection explains, "[s]ubstantive consolidation and the extinguishment of Intercompany Claims and Intercompany Liens under the Plan are two elements of a far broader "comprehensive compromise and settlement negotiated by the Debtors the Committees" to be effectuated as a package under the Plan." *See Objection ¶10*. The Plan cannot be consummated in the fashion advocated by the Sarachek Noteholders and their attempt to cherry-pick what provisions of the Confirmation Order should be stayed simply does not work and should be rejected.

6. As set forth in detail in the Objection, the Stay Motion also fails to establish any of the four prongs required to justify the imposition of a stay. The Sarachek

Noteholders have not made any showing they will succeed on the merits. The Sarachek Noteholders will not be irreparably harmed. In fact, the issuance of the stay would cause significant injury to the creditors of these estates because their proposed distributions will be delayed while the appeal is adjudicated. Finally, it is within the public interest for the Plan to be consummated. Over 9,000 investors were defrauded by the Debtors' former principal. The Plan (overwhelmingly accepted by the Debtors' creditors), as confirmed, is the best path forward to ameliorate the injuries suffered by the Debtors' creditors.

7. Accordingly, the Committee requests that the Court: (i) deny the Stay Motion; and (ii) grant such other and further relief as the Court deems appropriate.

Dated: November 19, 2018

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FOR THE DISTRICT OF DELAWARE**

In re:	:	
	:	Chapter 11
WOODBRIIDGE GROUP OF	:	
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	:	
Debtors.	:	(Jointly Administered)

CERTIFICATE OF SERVICE

I, Colin R. Robinson, hereby certify that on the 19th day of November, 2018, I caused a copy of the documents listed below to be served on the individuals on the attached service list in the manner indicated:

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' JOINDER TO
DEBTORS' OPPOSITION TO MOTION FOR STAY
PENDING APPEAL OF THE CONFIRMATION ORDER**

/s/ Colin R. Robinson

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