

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

In re:	:	Chapter 11
	:	
WOODBRIIDGE GROUP OF COMPANIES LLC, <i>et al.</i> , ¹	:	Case No. 17-12560 (KJC)
	:	
	:	(Jointly Administered)
	:	
Debtors.	:	Re: Docket Nos. 2958 & 3033
	:	

**OBJECTION OF THE AD HOC NOTEHOLDER GROUP TO
MOTION FOR STAY PENDING APPEAL OF THE CONFIRMATION ORDER,
AND JOINDER TO DEBTORS’ OPPOSITION THERETO**

The Ad Hoc Group of Noteholders Formed Pursuant to January 23, 2018, Order [D.I. 357] (the “**Noteholder Group**”), by and through its 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**”). In further support of the Objection, the Noteholder Group respectfully represents as follows:

BACKGROUND

1. On Friday, November 9, 2018, certain noteholders represented by The Sarachek Law Firm (the “**La Rochelle Noteholders**”) filed (1) 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**”) and (2) the *Motion to Shorten*

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 14225 Ventura Boulevard #100, Sherman Oaks, California 91423. A complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses may be obtained on the website of the Debtors’ noticing and claims agent at www.gardencitygroup.com/cases/WGC.

Notice with Respect to Motion for a Stay Pending Appeal of the Order Confirming Debtors' First Amended Joint Chapter 11 Plan of Liquidation [Docket No. 2959] (the "**Motion to Shorten**").

2. The Debtors filed their Objection on November 19, 2018.

OBJECTION AND JOINDER

3. The Noteholder Group objects to the Stay Motion, and adopts in full the Debtors' arguments set forth in their Opposition as if fully set forth herein. For the same reasons, the Noteholder Group fully joins in the Debtors' Opposition.

4. The Stay Motion is devoid of any merit and should be denied. Regrettably, but consistent with prior failed efforts by the La Rochelle Noteholders in these cases, the Stay Motion is yet another meritless effort by this dissident group to wreak havoc in these cases and cause real, further hardship and prejudice to all investor victims.

5. In the face of the tremendous, organized and successful efforts by the estate parties to prosecute and to support confirmation of the Debtors' chapter 11 plan, this dissident group has missed no opportunity to do the least amount of diligence, investigation and work. Instead, they have at all times pursued ill-fated and uninformed factual and legal positions with only the most cursory of analysis. They have never even taken discovery in these cases to recognize the profound lack of merit of their positions, and the extraordinary hardship their positions would cause other investor victims if they were ever to be implemented. Indeed, even a modest amount of diligence on the part of this dissident group would lay bare the irreconcilable conflicts among the many client parties in the group.

6. For these reasons, among others, the Noteholder Group wishes to emphasize the stark inequities involved in the Stay Motion as between this dissident group and every single other one of the approximately 9,331 noteholder victims and some 1,583 unitholder victims. As the Debtors point out in their Opposition, there is simply no comparison

between the real hardship the requested stay would cause all investor victims, and the utter lack of equities in favor of this dissident group.

7. The Noteholder Group fully supports the Debtors' position as to the bond requirement that must be imposed should the Court nonetheless be inclined to grant the requested stay.

CONCLUSION

WHEREFORE, the Noteholder Group respectfully requests that the Court: (i) deny the Motion to Shorten; and (ii) grant such other and further relief as the Court deems appropriate.

Dated: November 19, 2018
Wilmington, Delaware

DRINKER BIDDLE & REATH LLP

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