

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

In re:

WOODBRIIDGE GROUP OF COMPANIES,
LLC, *et al.*,¹

Debtors.

WOODBRIIDGE GROUP OF COMPANIES,
LLC, *et al.*,

Plaintiffs

vs.

SECURITIES AND EXCHANGE
COMMISSION,

Defendant.

Chapter 11

Case No. 17-12560 (KJC)

Jointly Administered

Adversary Proceeding
No. 17-51891 (KJC)

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON JANUARY 18, 2018, AT 10:00 A.M. (ET)³**

ADJOURNED MATTER

1. Debtors' Motion for Temporary Restraining Order and Preliminary Injunction Enforcing the Automatic Stay Pursuant to Sections 105(a) and 362(a) of the Bankruptcy Code [Adv. Docket No. 2, 12/28/17]

Related Documents:

- A. Debtors' Verified Complaint for Declaratory Relief Under Section 362(a) of the Bankruptcy Code, Injunctive Relief Under Sections 105(a) and 362(a) of the Bankruptcy Code, and a Preliminary Injunction Under Rule

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. 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' proposed noticing and claims agent at www.gardencitygroup.com/cases/WGC, or by contacting the proposed undersigned counsel for the Debtors.

² Amended information appears in **bold**.

³ To the extent the hearing does not conclude on January 18th, the Court will carry the matters still under consideration to January 19 at 10:00.

7065 of the Federal Rules of Bankruptcy Procedure [Adv. Docket No. 1, 12/28/17]

- B. Memorandum of Law in Support of Debtors' Motion for Temporary Restraining Order and Preliminary Injunction Enforcing the Automatic Stay Pursuant to Sections 105(a) and 362(a) of the Bankruptcy Code [Adv. Docket No. 3, 12/28/17]
- C. Exhibit E to Complaint [Adv. Docket No. 5, 12/28/17]
- D. Amended Notice of Hearing [Adv. Docket No. 6, 12/28/17]
- E. Order Scheduling Hearing and Date for Response to the Debtors' Motion for Temporary Restraining Order and Preliminary Injunction Enforcing the Automatic Stay [Adv. Docket No. 9, 12/28/17]
- F. Notice of Entry of Orders in the Florida Securities Action [Adv. Docket No. 11, 12/30/17]

Objection Deadline: January 3, 2018 at 12:00 p.m. (ET)

Objections/Responses Filed:

- A. Objection of the U.S. Securities and Exchange Commission [Adv. Docket No. 12, 1/2/18]
- B. **Reservation of Rights of the Ad Hoc Committee of Unitholders of Woodbridge Mortgage Investment Fund Entities with Respect to: Debtors' Motion for Interim and Final Orders (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief; (2) Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders; and (3) Debtors' Motion for Temporary Restraining Order and Preliminary Injunction Enforcing the Automatic Stay Pursuant to Sections 105(a) and 362(a) of the Bankruptcy Code [Docket No. 297, 1/16/18] (*See matter 6(h)*)**

Status: This matter will be adjourned to a date and time to be determined.

UNCONTESTED MATTERS WITH CERTIFICATION OF COUNSEL

2. Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105(a), 363(b), 503(b)(9), 1107(a), and 1108 of the Bankruptcy Code, Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors; and Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related to the Foregoing [Docket No. 6, 12/4/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Committee to January 12, 2018 at 4:00 p.m. (ET)

Related Documents:

- A. Interim Order, Pursuant to Sections 105(a), 363(b), 503(b)(9), 1107(a), and 1108 of the Bankruptcy Code, Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors, and Authorizing Banks to Honor Process Checks and Electronic Transfer Requests Related to the Foregoing [Docket No. 48, 12/5/17]
- B. Omnibus Notice of Pleadings and Hearing Thereon [Docket No. 63, 12/6/17]
- C. Certification of Counsel [Docket No. 291, 1/16/18]
- D. **Second Interim Order, Pursuant to Sections 105(a), 363(b), 503(b)(9), 1107(a), and 1108 of the Bankruptcy Code, Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors, and Authorizing Banks to Honor Process Checks and Electronic Transfer Requests Related to the Foregoing [Docket No. 295, 1/16/18]**

Objections/Responses Received:

- A. Informal comments of the Official Committee of Unsecured Creditors

Status: **An order has been entered.** No hearing is required.

3. Debtors' Motion for Entry of an Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business [Docket No. 117, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET); extended for the United States Trustee, the Committee, the SEC, the Ad Hoc Noteholders Groups, and the Ad Hoc Unitholders Group (the "Objection Extension Parties") to January 11, 2018 at 4:00 p.m. (ET); further extended for the Committee to January 12, 2018 at 4:00 p.m. (ET)

Related Documents:

- A. Notice of Supplement to List of Ordinary Course Professionals [Docket No. 208, 1/3/18]
- B. Second Notice of Supplement to List of Ordinary Course Professionals [Docket No. 249, 1/8/18]
- C. Certification of Counsel [Docket No. 290, 1/16/18]
- D. Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business [Docket No. 296, 1/16/18]**

Objections/Responses Received:

- A. Informal comments of the Office of the United States Trustee
- B. Informal comments of the Committee

Status: **An order has been entered.** No hearing is required.

CONTESTED MATTERS GOING FORWARD—TRUSTEE APPOINTMENT MOTIONS

- 4. Emergency Motion of Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104 [Docket No. 150, 12/28/17]

Objection Deadline: January 8, 2018 at 12:00 p.m. (ET)

Related Documents:

- A. Order Fixing Hearing Date and Shortening Time to Object or Respond to Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104 [Docket No. 170, 1/2/18]
- B. Notice of Hearing [Docket No. 173, 1/2/18]

Objections/Responses Received:

- A. Response by Noteholders Jointly Represented by the Law Office of Curtis A. Hehn to: (1) the Committee's Emergency Motion for the Appointment of a Chapter 11 Trustee [Docket No. 150]; (2) the SEC's Motion for the Appointment of a Chapter 11 Trustee; and (3) the Ad Hoc Committee of Holders of Promissory Notes for the Appointment of an Official Committee of Noteholders [Docket No. 85] [Docket No. 236, 1/8/18]

- B. United States Trustee's Omnibus Response in Support of Official Committee of Unsecured Creditors and Securities and Exchange Commission Motions for the Appointment of a Chapter 11 Trustee [Docket No. 237, 1/8/18]
- C. Response of 805 Nimes Place, LLC to Motions for Appointment of Chapter 11 Trustee [Docket No. 238, 1/8/18]
- D. Opposition of the Joinder Noteholder Group to (1) Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to U.S.C. § 1104 and (2) Motion by the U.S. Securities and Exchange Commission for Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 239, 1/8/18]
- E. Debtors' Objection to Motions of (I) Official Committee of Unsecured Creditors and (Ii) the U.S. Securities and Exchange Commission for Entry of an Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 240, 1/8/18]
- F. Omnibus Objection of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates to the Pending Motions for Appointment of a Chapter 11 Trustee [Docket No. 245, 1/8/18]

Status: This matter is going forward.

- 5. Motion by the U.S. Securities and Exchange Commission for Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 157, 1/2/18]

Objection Deadline: January 8, 2018 at 12:00 p.m. (ET)

Related Documents:

- A. Order Scheduling Hearing on, and Setting Objection Deadline for, The SEC's Motion to Appoint Chapter 11 Trustee [Docket No. 171, 1/2/18]
- B. Notice of Motion [Docket No. 174, 1/2/18]

Objections/Responses Received:

- A. Response by Noteholders Jointly Represented by the Law Office of Curtis A. Hehn to: (1) the Committee's Emergency Motion for the Appointment of a Chapter 11 Trustee [Docket No. 150]; (2) the SEC's Motion for the Appointment of a Chapter 11 Trustee; and (3) the Ad Hoc Committee of Holders of Promissory Notes for the Appointment of an Official Committee of Noteholders [Docket No. 85] [Docket No. 236, 1/8/18] (*See matter 4(a)*)
- B. United States Trustee's Omnibus Response in Support of Official Committee of Unsecured Creditors and Securities and Exchange Commission Motions for the Appointment of a Chapter 11 Trustee [Docket No. 237, 1/8/18] (*See matter 4(b)*)
- C. Response of 805 Nimes Place, LLC to Motions for Appointment of Chapter 11 Trustee [Docket No. 238, 1/8/18] (*See matter 4(c)*)
- D. Opposition of the Joinder Noteholder Group to (1) Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to U.S.C. § 1104 and (2) Motion by the U.S. Securities and Exchange Commission for Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 239, 1/8/18] (*See matter 4(d)*)
- E. Debtors' Objection to Motions of (I) Official Committee of Unsecured Creditors and (Ii) the U.S. Securities and Exchange Commission for Entry of an Order Directing the Appointment of a Chapter 11 Trustee [Docket No. 240, 1/8/18] (*See matter 4(e)*)
- F. Omnibus Objection of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates to the Pending Motions for Appointment of a Chapter 11 Trustee [Docket No. 245, 1/8/18] (*See matter 4(f)*)

Status: This matter is going forward.

OTHER CONTESTED MATTERS GOING FORWARD

6. Debtors' Motion for Interim and Final Orders (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Docket No. 22, 12/4/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET); extended for noteholders jointly represented by the Law Office of Curtis A. Hehn to January 4, 2018 at 4:00 p.m. (ET); extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET); further extended for the Committee to January 12, 2018 at 4:00 p.m. (ET)

Related Documents:

- A. Declaration of Lawrence R. Perkins in Support of the Debtors' Chapter 11 Petitions and Requests for First Day Relief [Docket No. 12, 12/4/17]
- B. Notice of Proposed Draft Senior Secured Debtor in Possession Loan and Security Agreement [Docket No. 38, 12/5/17]
- C. *Corrected* Interim Order on Emergency Motion for: Entry of Interim Order (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Docket No. 59, 12/6/17]
- D. Notice of Entry of Interim DIP Order and Further Interim and Final Hearings on Proposed DIP Financing [Docket No. 62, 12/6/17]
- E. Supplemental Declaration of Lawrence R. Perkins [Docket No. 84, 12/15/17]
- F. Second Interim Order on Emergency Motion for: Entry of Interim Order (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Docket No. 130, 12/21/17]
- G. Notice of Entry of Further Interim DIP Order and Final Hearing on Proposed DIP Financing [D.I. 133, 12/21/17]

Objections/Responses Received:

- A. United States Trustee's Objection to Entry of Interim Order [Docket No. 87, 12/18/17]
- B. Homeowner's Association at Aspen Glen, Inc.'s Statement and Reservation of Rights with Respect to Debtor in Possession Financing [Docket No. 93, 12/19/17]
- C. Reservation of Rights of the Official Committee of Unsecured Creditors [Docket No. 109, 12/20/17]
- D. Objection of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates to the Debtors' DIP Financing Motion and Proposed Second Interim DIP Order [Docket No. 113, 12/20/17]
- E. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- F. Response and Limited Objection of the Richardson Company to the Debtors' Motion for Interim and Final Orders (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing the Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Re D.I. No. 22] [Docket No. 195, 1/3/18]
- G. Limited Objection by Noteholders Jointly Represented by the Law Office of Curtis A. Hehn to Final Relief Sought in Debtors' Motion for Interim and Final Orders (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief [Docket No. 217, 1/4/18]
- H. **Reservation of Rights of the Ad Hoc Committee of Unitholders of Woodbridge Mortgage Investment Fund Entities with Respect to: Debtors' Motion for Interim and Final Orders (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief; (2) Motion of the Ad Hoc Committee of**

Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders; and (3) Debtors' Motion for Temporary Restraining Order and Preliminary Injunction Enforcing the Automatic Stay Pursuant to Sections 105(a) and 362(a) of the Bankruptcy Code [Docket No. 297, 1/16/18]

Status: The Debtors intend to present the Court with a further interim order and adjourn final consideration of this matter to the hearing scheduled for February 13, 2018, at 1:00 p.m. (ET). This matter is going forward on a further interim basis.

7. Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders [Docket No. 85, 12/18/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET), extended for the Debtors and the Committee to January 15, 2018 at 4:00 p.m. (ET) and extended for the United States Trustee to **a date to be determined.**

Related Documents:

- A. Joinder of Noteholder Rodney Black to Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders [Docket No. 89, 12/19/17]
- B. Re-Notice of Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders [Docket No. 100, 12/19/17]
- C. Joinder of Additional Noteholders to Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders [Docket No. 198, 1/3/18]

Objections/Responses Received:

- A. Response of the U.S. Securities and Exchange Commission to (I) the Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders, and (II) The Joinder of Additional Noteholders to That Motion [Docket No. 213, 1/4/18]
- B. Reply to Response of the U.S. Securities and Exchange Commission to (I) the Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders, and (II) The Joinder of Additional Noteholders to That Motion [Docket No. 231, 1/5/18]
- C. Response by Noteholders Jointly Represented by the Law Office of Curtis A. Hehn to: (1) the Committee's Emergency Motion for the Appointment of a Chapter 11 Trustee [Docket No. 150]; (2) the SEC's Motion for the Appointment of a Chapter 11 Trustee; and (3) the Ad Hoc Committee of Holders of Promissory Notes for the Appointment of an Official Committee of Noteholders [Docket No. 85] [Docket No. 236, 1/8/18]
- D. Objection of Official Committee of Unsecured Creditors to: (I) Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Unsecured Noteholders, and (II) Joinder of Additional Noteholders to Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Unsecured Noteholders [Docket No. 288, 1/15/18]
- E. Debtors' Statement in Support of (I) Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders, and (II) Motion of the Ad Hoc Committee of Unitholders of Woodbridge Mortgage Investment Fund Entities Pursuant to Section 1102(a)(2) Directing Appointment of an Official Committee of Unitholders [Docket No. 292, 1/16/18]

- F. Reservation of Rights of the Ad Hoc Committee of Unitholders of Woodbridge Mortgage Investment Fund Entities with Respect to: Debtors' Motion for Interim and Final Orders (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 Authorizing Debtors to (A) Obtain Postpetition Secured Financing, (B) Use Cash Collateral, (C) Grant Adequate Protection to Prepetition Secured Parties; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (IV) Granting Related Relief; (2) Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders; and (3) Debtors' Motion for Temporary Restraining Order and Preliminary Injunction Enforcing the Automatic Stay Pursuant to Sections 105(a) and 362(a) of the Bankruptcy Code [Docket No. 297, 1/16/18] (*See matter 6(h)*)**

Status: **Adjourned to a date and time to be determined.**

8. Debtors' Motion for Entry of an Order Pursuant to Section 363 of the Bankruptcy Code Authorizing (I) the Engagement Letter Between the Debtors and SierraConstellation Partners LLC and (II) Debtors' Employment of Lawrence R. Perkins as Chief Restructuring Officer *Nunc Pro Tunc* to the Petition Date [Docket No. 102, 12/19/17]

Objection Deadline: January 2, 2018 at 4:00 p.m. (ET); extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET); further extended for the U. S. Trustee to January 12, 2018 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18]
- B. Informal comments of the Office of the United States Trustee

Status: The only objection presently outstanding is the omnibus objection filed by the SEC. This matter will be going forward as to that response.

9. Debtors' Application for Entry of Order Authorizing the Employment and Retention of Homer Bonner Jacobs, PA, as Special Litigation Counsel to the Debtors and Debtors in Possession *Nunc Pro Tunc* to Petition Date [Docket No. 111, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET); extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET); further extended for the U. S. Trustee to January 12, 2018 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18] (*See matter 8(a)*)
- B. Informal comments of the Office of the United States Trustee

Status: The only objection presently outstanding is the omnibus objection filed by the SEC. This matter will be going forward as to that response.

10. Debtors' Motion for an Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing the Debtors to Retain Expert Consultant *Nunc Pro Tunc* as of December 18, 2017 [Docket No. 116, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET); extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET); further extended for the U. S. Trustee to January 12, 2018 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18] (*See matter 8(a)*)
- B. Informal comments of the Office of the United States Trustee

Status: The only objection presently outstanding is the omnibus objection filed by the SEC. This matter will be going forward as to that response.

11. Debtors' Application for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Counsel for the Debtors, Effective as of the Petition Date [Docket No. 119, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET); extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET); further

Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18] (*See matter 8(a)*)
- B. Informal comments of the Office of the United States Trustee

Status: The only objection presently outstanding is the omnibus objection filed by the SEC. This matter will be going forward as to that response.

12. Debtors' Application for an Order Authorizing the Employment and Retention of Gibson, Dunn & Crutcher LLP as General Bankruptcy and Restructuring Co-Counsel for the Debtors and Debtors in Possession *Nunc Pro Tunc* to the Petition Date [Docket No. 122, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET); extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET); further extended for the U. S. Trustee to January 12, 2018 at 4:00 p.m. (ET)

Related Documents:

- A. Supplemental Declaration of Samuel A. Newman in Support of the Debtors' Application for an Order Authorizing the Employment and Retention of Gibson, Dunn & Crutcher LLP as General Bankruptcy and Restructuring Co-Counsel for the Debtors and Debtors in Possession *Nunc Pro Tunc* to the Petition Date [Docket No. 214, 1/3/18]

Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18] (*See matter 8(a)*)
- B. Informal comments of the Office of the United States Trustee

Status: **The Debtors anticipate filing a further supplemental declaration to address an informal comment from the United States Trustee.** The only objection

presently outstanding is the omnibus objection filed by the SEC. This matter will be going forward as to that response.

13. Application of the Debtors for Order (I) Authorizing Retention and Employment of Moelis & Company LLC as Investment Banker to the Debtors *Nunc Pro Tunc* to December 12, 2017 Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 [Docket No. 123, 12/20/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET); extended for the Objection Extension Parties to January 11, 2018 at 4:00 p.m. (ET); further extended for the Committee to January 15, 2018 at 4:00 p.m. (ET) and for the U. S. Trustee to January 16, 2018 at 4:00 p.m. (ET)

Related Documents:

- A. Supplemental Declaration of William Derrough in Support of Application of the Debtors for Order (I) Authorizing Retention and Employment of Moelis & Company LLC as Investment Banker to the Debtors *Nunc Pro Tunc* to December 12, 2017 Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 [Docket No. 152, 12/29/17]
- B. **Motion for an Order Granting the Debtors Leave and Permission to File the Debtors' Response in Support of Their Application for Order (I) Authorizing Retention and Employment of Moelis & Company LLC as Investment Banker to the Debtors *Nunc Pro Tunc* to December 12, 2017 Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 [Docket No. 300, 1/17/18]**
- C. **Declaration of Marc Beilinson in Support of Debtors' Application for Order (I) Authorizing Retention and Employment of Moelis & Company LLC as Investment Banker to the Debtors *Nunc Pro Tunc* to December 12, 2017 Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 [Docket No. 301, 1/17/18]**

Objections/Responses Received:

- A. Omnibus Objection by the U.S. Securities and Exchange Commission to Motions and Applications Set for Hearing on January 10, 2018 and Reservation of Rights [Docket No. 167, 1/2/18] (*See matter 8(a)*)

- B. Official Committee of Unsecured Creditors' Objection to the Application of Debtors for Order (I) Authorizing Retention and Employment of Moelis & Company LLC as Investment Banker to the Debtors *Nunc Pro Tunc* to December 12, 2017 Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) and (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-2 [Docket No. 289, 1/15/18]
- C. Informal comments of the Office of the United States Trustee

Status: The informal comments of the United States Trustee have been resolved.

This matter is going forward.

- 14. Official Committee of Unsecured Creditors' Application for Order, Pursuant to 11 U.S.C. §§ 328, and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to December 14, 2017 [Docket No. 137, 12/22/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET); extended for the Objection Extension Parties and the Debtors to January 11, 2018 at 4:00 p.m. (ET); further extended for the Debtors to January 12, 2018 at 4:00 p.m. (ET)

Related Documents:

- A. **Supplemental Declaration of Bradford J. Sandler in Support of the Application of the Official Committee of Unsecured Creditors for Order, Pursuant to 11 U.S.C. §§ 328, and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to December 14, 2017 [Docket No. 302, 1/17/18]**
- B. **Certification of Counsel Regarding Application of the Official Committee of Unsecured Creditors for Order, Pursuant to 11 U.S.C. §§ 328, and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to December 14, 2017 [Docket No. 304, 1/17.18]**

Objections/Responses Received:

- A. Informal comments of the Office of the United States Trustee

Status: A revised form of order has been submitted under certification of counsel. No hearing is required.

15. Official Committee of Unsecured Creditors' Application Pursuant to Fed. R. Bankr. P. 2014(a) for Order Under Section 1103 of the Bankruptcy Code Authorizing the Employment and Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors [Docket No. 138, 12/22/17]

Objection Deadline: January 3, 2018 at 4:00 p.m. (ET); extended for the Objection Extension Parties and the Debtors to January 11, 2018 at 4:00 p.m. (ET); further extended for the Debtors to January 12, 2018 at 4:00 p.m. (ET)

Related Documents:

- A. **First Supplemental Declaration of Matthew Diaz in Support of the Application Authorizing the Employment and Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to December 14, 2017 [Docket No. 303, 1/17/18]**
- B. **Certification of Counsel Regarding Application Pursuant to Fed. R. Bankr. P. 2014(a) for Order Under Section 1103 of the Bankruptcy Code Authorizing the Employment and Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to December 14, 2017 [Docket No. 305, 1/17.18]**

Objections/Responses Received:

- A. Informal comments of the Office of the United States Trustee

Status: **A revised form of order has been submitted under certification of counsel. No hearing is required.**

16. Motion of the Ad Hoc Committee of Unitholders of Woodbridge Mortgage Investment Fund Entities Pursuant to 11 U.S.C. § 1102(a)(2) Directing Appointment of an Official Committee of Unitholders [Docket No. 250, 1/8/18]

Requested Objection Deadline: January 17, 2018 at 12:00 p.m. (ET)

Related Documents:

- A. Motion of the Ad Hoc Committee of Unitholders of Woodbridge Mortgage Investment Fund Entities for Entry of an Order Shortening Notice of , and Setting a Hearing Date With Respect to, its Motion, Pursuant to 11 U.S.C. § 1102(a)(2) Directing Appointment of an Official Committee of Unitholders [Docket No. 251, 1/8/18]

Objections/Responses Received:

- A. Debtors' Statement in Support of (I) Motion of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates Pursuant to Section 1102(a)(2) of the Bankruptcy Code Directing the Appointment of an Official Committee of Noteholders, and (II) Motion of the Ad Hoc Committee of Unitholders of Woodbridge Mortgage Investment Fund Entities Pursuant to Section 1102(a)(2) Directing Appointment of an Official Committee of Unitholders [Docket No. 292, 1/16/18]

Status: The movant has requested this matter go forward on January 18, 2018 at 10:00 a.m. (ET).

- 17. **Application Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorizing to Employ and Retain Berger Singerman LLP as Special Counsel for the Official Committee of Unsecured Creditors, *Nunc Pro Tunc* to December 26, 2017 [Docket No. 223, 1/5/18]**

Objection Deadline: January 16, 2018 at 4:00 p.m. (ET)

Related Documents:

- A. **Order Fixing Hearing Date and Shortening Time to Object or Respond to Application Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorizing to Employ and Retain Berger Singerman LLP as Special Counsel for the Official Committee of Unsecured Creditors, *Nunc Pro Tunc* to December 26, 2017 [Docket No. 229, 1/5/18]**
- B. **Notice of Hearing [Docket No. 232, 1/5/18]**
- C. **Supplemental Declaration Paul Steven Singerman in Support of Application Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorizing to Employ and Retain Berger Singerman LLP as Special Counsel for the Official Committee of Unsecured Creditors, *Nunc Pro Tunc* to December 26, 2017 [Docket No. 306, 1/17/18]**
- D. **Certification of Counsel Regarding Application Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorizing to Employ and Retain Berger Singerman LLP as Special Counsel for the**

**Official Committee of Unsecured Creditors, *Nunc Pro Tunc* to
December 26, 2017 [Docket No. 307, 1/17/18]**

Objections Filed:

A. Informal Response of United States Trustee

**Status: A revised form of order has been submitted under certification of
counsel. No hearing is required.**

Dated: Wilmington, Delaware
January 17, 2018

/s/ Ian J. Bambrick

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