

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

**In re:**

**WOODBIDGE GROUP OF  
COMPANIES, LLC, et al<sup>1</sup>,**

**Debtors**

**Chapter 11  
Case # 17-12560(KJC)  
Jointly Administered  
Hearing Date: TBD (Requested expedited)  
Objection Deadline TBD ( Requested expedited)**

**CREST STEEL CORP. MOTION PURSUANT TO DEL. BANKR. LR. 9006-1(e) FOR  
AN ORDER SHORTENING NOTICE FOR THE  
MOTION OF CREST STEEL CORP. FOR LIMITED RELIEF FROM THE  
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d) AND WAIVER  
OF THE STAY IN FED. R. BANKR. P. 4001(a)(3)**

Crest Steel Corp., ("Crest"), by and through its undersigned counsel, moves this Court pursuant to Del. Bankr. L.R. 9006-1 for entry of an order shortening notice (the "Motion to Shorten Notice") for their motion filed simultaneously herewith (the "Motion for Relief from Stay"), for an Order granting limited relief from the automatic stay pursuant to 11 U.S.C. § 362(d), as to Debtors to enable and authorize Crest to file and serve a Notice of Mechanic's Lien and a Complaint to Foreclose on a Mechanic's Lien to be recorded against real property in Beverly Hills California, Los Angeles County pursuant to 11 U.S.C. § 362(d)(1). Crest also seeks waiver of the stay imposed by Rule 4001 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). In support of the Motion to Shorten Notice Crest relies upon its Motion for Relief from Stay and further states as follows:

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<sup>1</sup> 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. The 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 noticing and claims agent at [www.eardencitygroup.com/cases/WGC](http://www.eardencitygroup.com/cases/WGC).

1. Pursuant to Del.Bankr.LR. 9006-1 (e), "[n]o motion will be scheduled on less notice than required by these rules or the Fed.R.Bankr.P. except by Order of the Court, on written motion (served on all interested parties) specifying the exigencies justifying shortened notice. The Court will rule on such motion promptly without need for hearing."

2. The Debtors filed their Petitions on December 4, 2017, and until January 23, 2018, it was unclear if a Chapter 11 Trustee was going to be appointed or how the Petitions were going to be addressed by this Court. Upon information and belief on January 23, 2018, a settlement was reached which will result in new management for the Debtors. In addition, it is unclear whether the Debtors will continue to be represented by their counsel of record or if new counsel will be chosen.

3. There is a real timeclock running and while this Honorable Court was addressing multiple issues on how these cases would proceed and who would be responsible on behalf of the Debtors regarding the management of the Debtors, Crest ascertained that one or more Debtors were the owners of record of the Property for which Crest supplied steel for construction and improvement of the Property and upon whom a mechanics lien must be filed no later than February 2, 2018, in order to insure the preservation of the rights of Crest Steel Corp.

4. Counsel for Crest has recently contacted the present counsel for the Debtors to determine if they would stipulate to a limited relief from stay, but as of today's date, it is unclear who will have the authority to make this decision and time is of the essence.

5. Crest is owed \$51,476.65 for material supplied to Leon Krous Drilling and delivered to the Property for Construction and Improvements to the Property. The last delivery made by Crest was completed on November 2, 2017, but Crest is without information or belief as to when, or even whether, work was completed.

6. In order to insure that Crest timely proceeds to file and perfect its Mechanic's Lien against the Debtors, Crest must obtain Relief from Stay prior to February 2, 2018 as further explained in the Motion for Relief filed simultaneously herewith.

8. Motions must generally be filed and served twenty-one (21) days before the hearing as set forth in Local R. of Bankr. P. 9006-1 (c), however, the Motion for Relief from Stay should be heard on shortened notice. Crest requests that the hearing on the Motion for Relief from Stay be as soon as possible, but in any event before February 2, 2018.

9. Crest will serve this Motion to Shorten Notice, along with a copy of the Motion for Relief from Stay and a copy of any order granting the Motion to Shorten Notice upon (i) counsel for the Debtors by email and hand delivery; (II) counsel for the Committee by email and hand delivery and (ii) the Office of the United States Trustee by email and hand delivery. All parties will also be served electronically on the CM/ECF System. In light of the nature of the relief requested, Crest submits that no other or further notice is necessary.

WHEREFORE, Crest Steel Corp moves this Honorable Court to enter an Order:

(i) scheduling a hearing on the Motion for Relief from Stay prior to February 2, 2018, to preserve the status quo; (ii) approving notice as set forth above; and (iii) granting such further relief as is just and equitable.

Dated: January 26, 2018

**MONZACK MERSKY MCLAUGHLIN AND  
BRIWDER, PA**

*/s/ Rachel B. Mersky*

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

WOODBIDGE GROUP OF  
COMPANIES, LLC, et al<sup>1</sup>,

Chapter 11  
Case # 17-12560(KJC)  
Jointly Administered

Debtors

**ORDER GRANTING CREST STEEL CORP MOTION PURSUANT TO DEL.  
BANKR. LR. 9006-1(e) FOR AN ORDER  
SHORTENING NOTICE WITH RESPECT TO RELIEF FROM THE  
AUTOMATIC STAY PURSUANT TO 11 U.S.C § 362(d) AND  
WAIVER OF THE STAY IN FED. R. BANKR. P. 4001(a)(3)**

Upon consideration of Crest Steel Corp.'s Motion Pursuant to Del. Bankr. L.R. 9006-1(e) for an Order Shortening Notice (the "Motion to Shorten Notice") with Respect to Crest Steel Corp. Limited Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and Waiver of the Stay in Fed. R. Bankr. P. 4001(a)(3) (the "Motion for Relief from Stay"), It is hereby:

ORDERED THAT, the Motion to Shorten Notice is GRANTED; and it is

ORDERED THAT, a hearing on the Motion for Relief from Stay is scheduled for

(Eastern) at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5<sup>th</sup> Floor, Courtroom #5, Wilmington, Delaware 19801;

ORDERED THAT, objections, if any, to the Motion for Relief from Stay are due (Eastern); and it is further

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<sup>1</sup>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. The 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 noticing and claims agent at [www.eardencitygroup.com/cases/WGC](http://www.eardencitygroup.com/cases/WGC).

ORDERED THAT, Crest Steel Comp. shall serve the Motion to Shorten Notice, a copy of this Order, and the Motion for Relief from Stay upon (i) counsel for the Debtors by hand and email; (ii) the Office of the United States Trustee by hand; (iii) counsel for the Committee by hand and email; and serve all other parties by ECF.

Dated: January 26, 2018  
Wilmington, DE

BY THE COURT:

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Kevin J Carey  
U.S. BANKRUPTCY JUDGE