

**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)

Hearing Date: N/A

Objection Date: N/A

**DEBTORS' MOTION FOR AN ORDER PURSUANT TO
BANKRUPTCY RULE 9006(c) AND LOCAL RULE 9006-1(e) SHORTENING
THE TIME FOR NOTICE OF THE HEARING TO CONSIDER THE DEBTORS'
MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE SALE OF 8692
FRANKLIN AVENUE, LOS ANGELES, CALIFORNIA PROPERTY OWNED BY
THE DEBTORS IN FEE SIMPLE FREE AND CLEAR OF LIENS, CLAIMS,
ENCUMBRANCES, AND OTHER INTERESTS; (II) APPROVING THE RELATED
PURCHASE AGREEMENT; AND (III) GRANTING RELATED RELIEF**

Woodbridge Group of Companies, LLC and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), having contemporaneously filed herewith the *Debtors' Motion for Entry of an Order (I) Authorizing the Sale of 8692 Franklin Avenue, Los Angeles, California Property Owned by the Debtors in Fee Simple Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (II) Approving the Related Purchase Agreement; and (III) Granting Related Relief* (the "Motion"),² hereby submit this motion (the "Motion to Shorten"), pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 9006-1(e) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of

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

² All terms not otherwise defined herein shall be given the meanings ascribed to them in the Motion.

Delaware (the “Local Rules”), requesting that the Court enter an order shortening the time for notice of the hearing to consider approval of the Motion so that the matter may be heard at the omnibus hearing in these chapter 11 cases (the “Chapter 11 Cases”) scheduled for February 13, 2018 at 1:00 p.m. (ET) (the “February Hearing”); and (b) setting a deadline of 4:00 p.m. (ET) on February 8, 2018 (the “Proposed Objection Deadline”) for objections or responses to the Motion. In support of this Motion to Shorten, the Debtors respectfully state as follows:

1. Bankruptcy Rule 2002(a)(2) requires twenty-one (21) days’ notice prior to the hearing date of “a proposed use, sale, or lease of property of the estate other than in the ordinary course of business, unless the court for cause shortens the time or directs another method of giving notice.” Fed. R. Bankr. P. 2002(a)(3). Pursuant to Local Rule 9006-1(e), however, such period may be shortened by order of the court upon written motion specifying the exigencies supporting shortened notice. Del. Bankr. L.R. 9006-1(e). Moreover, according to Bankruptcy Rule 9006(c), “the court for cause shown may in its discretion with or without motion or notice order the period reduced.” Fed. R. Bankr. P. 9006(c)(1). In exercising such discretion, the court should “consider the prejudice to parties entitled to notice and weigh this against the reasons for hearing the motion on an expedited basis.” *In re Philadelphia Newspapers, LLC*, 690 F.3d 161, 172 (3d Cir. 2012) (noting the commonness of such motions “given the accelerated time frame of bankruptcy proceedings”). The Debtors submit that there is sufficient cause to justify shortening the notice period for the hearing on the Motion.

2. As set forth more fully in the Motion, in the exercise of their sound business judgment, the Debtors have determined that the prompt Sale, subject to certain notice procedures set forth therein, is in the best interest of the Debtors, their estates, their creditors, and all other parties in interest, and will enable the Debtors to maximize the value of the Property.

Developing and selling homes is the Debtors' principal business. Accordingly, the Debtors' ability to satisfy their contractual obligations to homebuyers and to continue to sell homes during these cases is essential to the continuation of the Debtors' business, vital to the preservation of enterprise value, and critical to the Debtors' survival as a going concern. In addition, the current scheduled closing date is March 15, 2018. The escrow agent for the Sale will not close escrow until fourteen (14) days after an order approving the Sale is entered. As such, so that the Sale may close as scheduled, shortening notice is justified. In sum, shortening notice is in the best interests of the Debtors, their estates, and their creditors, as it will allow the Debtors to proceed with the Sale in a timely and efficient manner, without prejudicing the rights of interested parties.

3. Based on the foregoing, the Debtors submit that cause exists to shorten the notice period for the hearing on the Motion. The Debtors propose to give any party objecting to the Motion until the Proposed Objection Deadline to file and serve any objections upon the undersigned counsel for the Debtors. The Proposed Objection Deadline will allow the Debtors to file a complete notice of agenda prior to the deadline for filing the agenda for the February Hearing.

4. To compensate for the reduced notice period, the Debtors will serve the Motion via Federal Express, overnight delivery, fax, or email, on (i) the U.S. Trustee; (ii) counsel to the DIP lender; (iii) counsel for the Committee; (iv) counsel for the Noteholder Group, (v) counsel for the Unitholder Group, (vi) all Noteholders known by the Debtors to have interests in any loan documents associated with the Property; (vii) the Affiliated Brokerage Entities; and (viii) any party that has requested notice pursuant to Bankruptcy Rule 2002.

5. Based on the foregoing, the Debtors submit (i) that cause exists to justify shortening the notice period for the hearing on approval of the relief requested in the Motion and (ii) that notice to the parties identified in the preceding paragraph will be adequate and sufficient. Accordingly, the Debtors requests that a hearing on the relief requested in the Motion be scheduled for the February Hearing, with objections due on or before the Proposed Objection Deadline.

[Remainder of page intentionally left blank]

WHEREFORE, the Debtors respectfully request the entry of an order, substantially in the form attached hereto as Exhibit A, granting the relief requested herein and such other and further relief as may be just and proper under the circumstances.

Dated: February 1, 2018
Wilmington, Delaware

/s/ Ian J. Bambrick

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Sean M. Beach (No. 4070)

Edmon L. Morton (No. 3856)

Ian J. Bambrick (No. 5455)

Betsy L. Feldman (No. 6410)

Rodney Square, 1000 North King Street

Wilmington, Delaware 19801

Tel: (302) 571-6600

Fax: (302) 571-1253

-and-

GIBSON, DUNN & CRUTCHER LLP

Samuel A. Newman (CA No. 217042)

Oscar Garza (CA No. 149790)

Daniel B. Denny (CA No. 238175)

333 South Grand Avenue

Los Angeles, California 90071

Tel: (213) 229-7000

Fax: (213) 229-7520

-and-

J. Eric Wise (NY No. 3000957)

Matthew K. Kelsey (NY No. 4250296)

Matthew P. Porcelli (NY No. 5218979)

200 Park Avenue

New York, New York 10166

Tel: (212) 351-4000

Fax: (212) 351-4035

Counsel to the Debtors and Debtors in Possession

EXHIBIT A

PROPOSED ORDER

**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)

Ref. Docket No.: ____

**ORDER PURSUANT TO BANKRUPTCY RULE 9006(c)
AND LOCAL RULE 9006-1(e) SHORTENING THE TIME FOR NOTICE
OF THE HEARING TO CONSIDER THE DEBTORS' MOTION FOR ENTRY
OF AN ORDER (I) AUTHORIZING THE SALE OF 8692 FRANKLIN AVENUE, LOS
ANGELES, CALIFORNIA PROPERTY OWNED BY THE DEBTORS IN FEE SIMPLE
FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND OTHER
INTERESTS; (II) APPROVING THE RELATED PURCHASE
AGREEMENT; AND (III) GRANTING RELATED RELIEF**

Upon the *Debtors' Motion for an Order Pursuant to Bankruptcy Rule 9006(c) and Local Rule 9006-1(e) Shortening the Time for Notice of the Hearing to Consider the Debtors' Motion for Entry of an Order (I) Authorizing the Sale of 8692 Franklin Avenue, Los Angeles, California Property Owned by the Debtors in Fee Simple Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (II) Approving the Related Purchase Agreement; and (III) Granting Related Relief*, (the "Motion to Shorten");² and this Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334(b) and 157, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and this Court having found that venue of these cases and the Motion in this district is proper

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² Capitalized terms used herein, but not otherwise defined, have the meanings given to them in the Motion to Shorten.

pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that due and proper notice of the Motion to Shorten having been given; and this Court having found and determined that the relief sought in the Motion to Shorten is in the best interests of the Debtors, their estates, their creditors and all other parties in interest; and 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 hereby GRANTED as set forth herein.
2. The hearing to consider the Motion will be held on February 13, 2018 at 1:00 p.m. (ET). Objections to the relief requested in the Motion shall be filed and served upon proposed counsel to the Debtors no later than February 8, 2018 at 4:00 p.m. (ET).
3. This Court shall retain jurisdiction over any and all matters arising from or related to the interpretation and/or implementation of this Order.

Dated: _____, 2018
Wilmington, Delaware

KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE