

**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)

**MOTION TO SHORTEN NOTICE AND OBJECTION PERIODS FOR, AND TO
SCHEDULE EXPEDITED HEARING ON, TINTARELLA LLC’S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362
AND/OR FOR ADEQUATE PROTECTION**

Tintarella LLC (“Tintarella”), a creditor and party in interest herein, by and through its undersigned counsel, submits this motion (the “Motion to Shorten”), for an order pursuant to Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9006-1(e) of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), shortening the time for notice and objection deadlines for, and scheduling an expedited hearing on, *Tintarella’s Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 and/or for Adequate Protection* (the “Motion for Relief”).² In support of the Motion to Shorten, Tintarella respectfully represents as follows:

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 92423. 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 Capitalized terms used but not defined herein shall have the meanings given to them in the Motion for Relief.

BACKGROUND AND RELIEF REQUESTED

1. On February 7, 2018, Tintarella filed the Motion for Relief, seeking authority to exercise its rights under applicable California law with respect to certain real property (the “Property”) owned by Grand Midway Investments, LLC (“GMI”), one of the above captioned debtors and debtors in possession (the “Debtors”), which serves as Tintarella’s collateral for a \$26,000,000 defaulted loan to GMI.

2. Local Rule 9006-1(c)(i) requires that all motions (except for discovery related motions) “be filed and served at least eighteen (18) days (twenty-one (21) days if service is by first class mail; nineteen (19) days if service is by overnight delivery) prior to the hearing date.” *See* Del. Bankr. L.R. 9006-1(c)(i). Further, Local Rule 9006-1(c)(ii) requires that the “deadline for objection(s) shall be no later than seven (7) days before the hearing date.” *See* Del. Bankr. L.R. 9006-1(c)(ii). Pursuant to Local Rule 9006(e), however, such periods may be shortened by order of the Court upon written motion specifying the exigencies supporting shortened notice. *See* Del. Bankr. L.R. 9006-1(e).

3. Tintarella respectfully requests that (i) the time period for notice in connection with the Motion for Relief be shortened so that the Motion for Relief can be heard on an expedited basis during the week of February 19, 2018 and (ii) the objection deadline be set such that any objections to the Motion for Relief may be filed by noon (ET) two days before the hearing. Because of the exigent nature of this matter, Tintarella respectfully requests that the initial hearing on the Motion for Relief be consolidated with the final hearing.

4. Cause exists to shorten the notice period and objection deadlines for the relief sought in the Motion for Relief. As set forth in the Motion for Relief, Tintarella transferred certain permits obtained from the Los Angeles Building and Safety Department (the “LABSD”) to GMI

in connection with the sale of the Property, allowing for the construction of a residence and guest house producing in excess of 22,000 square feet of livable space. Under LABSD requirements, permits are valid for a period of two (2) years from issuance and the proposed construction must be 75% complete within that two-year period. If these requirements are not satisfied, the owner of the property must return to LABSD for a plan check and meet then-existing code requirements, which would result in a loss of more than 5,000 square feet of livable space to the house constructed on the Property and additional costs and fees to draw up new architectural plans to conform with the new code requirements.

5. After obtaining two extensions of time from the LABSD, the permits at issue currently expire on June 10, 2018. No further extensions are expected. If the permits expire and the entitlements are lost, the Property will lose significant value. A recent appraisal has determined that the fair market value of the Property is \$34,100,000 with the permits and the build out of more than 22,000 square feet of livable space. Without the permits, the appraisal determined the fair market value to be \$26,250,000, because the livable space would be reduced by more than 5,000 square feet.

6. To date, despite constant reminders and knowing that the permits will expire unless 75% of the residences are constructed prior to June 10, 2018, the Debtors have not moved the project forward. Time is of the essence. It is now impossible to meet that deadline. Therefore, Tintarella requires relief from the automatic stay on an expedited basis to exercise its rights under California law. As such, cause exists to shorten the notice and objection periods and to schedule an expedited hearing on the Motion for Relief. For these reasons and as further explained in the Motion for Relief and supporting evidentiary Declarations, Tintarella seeks relief from the stay on an expedited basis so that it can protect the value of its Property.

7. Pursuant to Local Rule 9006-1(e), the Court may rule on this Motion to Shorten without the need for a hearing, and the Movants request that this Motion to Shorten be granted without further hearing.

NO PRIOR REQUEST AND RESERVATION OF RIGHTS

8. No previous request for the relief sought herein has been made to this Court or any other court.

NOTICE

9. Notice of this Motion has been provided to: (i) counsel for the Debtors; (ii) the Office of the United States Trustee; (iii) counsel for the Committee; (iv) counsel for the DIP Lender; (v) counsel for the Unitholder Group; (vi) counsel for the Noteholder Group; and (vii) parties requesting notice pursuant to Rule 2002. Tintarella submits that such notice is sufficient for the purpose of the Motion.

WHEREFORE Tintarella respectfully requests that the Court enter an order, substantially in the form attached hereto as Exhibit A, (i) granting this Motion to Shorten, (ii) scheduling a hearing on the Motion for Relief during the week of February 19, 2018, (iii) permitting any objections to the Motion for Relief to be filed by noon (ET) two days prior to the hearing (iv) consolidating the preliminary hearing on the Motion for Relief with the final hearing pursuant to § 362(e) of the Bankruptcy Code; and (v) granting such other and further relief as this Court deems just and proper.

Dated: February 8, 2018
Wilmington, DE

Respectfully submitted,

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Counsel to Tintarella LLC

EXHIBIT A

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

In re:

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

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Re: D.I. _____

**ORDER SHORTENING NOTICE AND OBJECTION PERIODS FOR MOTION FOR
RELIEF FROM THE AUTOMATIC STAY**

Upon the motion (the “Motion to Shorten”) of Tintarella LLC, seeking the entry of an order expediting consideration of, and shortening the notice periods applicable to, the *Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 and/or for Adequate Protection* (the “Motion for Relief”), and this Court possessing jurisdiction to consider the Motion to Shorten, and venue being proper, and notice of the Motion to Shorten having been sufficient under the circumstances, and the Court having considered the Motion to Shorten and all papers related thereto, and the relief requested in the motion to Shorten being warranted,

IT IS HEREBY ORDERED THAT:

1. The Motion to Shorten is GRANTED.
2. The Motion for Relief shall be heard at a final hearing on the merits on _____ (ET).

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 92423. 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.

3. Any responses or objections to the Motion for Relief may be filed by 12:00 p.m. (ET) on _____.

4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____, 2018
Wilmington, Delaware

THE HONORABLE KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE

CERTIFICATE OF SERVICE

I, Stephen B. Gerald, do hereby certify that on February 8, 2018, a copy of the foregoing (i) **Tintarella LLC's Motion for Relief from the Automatic Stay and/or for Adequate Protection;** and (ii) **Motion to Shorten Notice and Objection Periods for, and to Schedule Expedited Hearing on, Tintarella LLC's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 and/or for Adequate Protection** was served on the parties on the attached service list by first-class mail or in the manner indicated.

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