

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

In re:

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

Debtors.

WOODBIDGE 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 SECOND AMENDED² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON FEBRUARY 13, 2018 AT 1:00 P.M. (ET)**

ADJOURNED/RESOLVED MATTERS

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

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 Amended information appears in **bold**.

- 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]
- G. Order, Pursuant to Sections 105(a) and 1102 of the Bankruptcy Code and Bankruptcy Rule 9019, Approving the Consensual Resolution of (A) 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, (B) 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, (C) Motion by the U.S. Securities and Exchange Commission for Order Directing the Appointment of a Chapter 11 Trustee, (D) 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, and (E) 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. 357] (the "Settlement Order").
- H. Notice of Voluntary Dismissal of Adversary Proceeding [Adv. Docket No. 19, 2/2/18]

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

Objections/Responses Received:

- 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 has been withdrawn in accordance with the Settlement Order.

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

- 3. Motion of FHR Inc. to Conduct Examination of Debtors Pursuant to Bankruptcy Rule 2004 [Docket No. 457, 2/1/18]

Objection Deadline: February 8, 2018 at 4:00 p.m. (ET), extended to March 1, 2018 at 4:00 p.m. (ET)

Objections/Responses Received: None as of the filing of this Agenda

Status: This matter is adjourned by agreement to March 8, 2018 at 10:00 a.m. (ET)

UNCONTESTED MATTERS GOING FORWARD

- 4. Debtors' Motion for an Order, Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, Authorizing the Debtors to (I) (A) Retain Development Specialists, Inc. as Their Restructuring Advisor, (B) Designate Bradley D. Sharp as Chief Restructuring Officer, *Nunc Pro Tunc* to January 26, 2018, and (C) to Utilize Additional DSI Personnel; and (II) Approving the agreement Related Thereto [Docket No. 512, 2/7/18]

Objection Deadline: Objections may be presented at the time of the hearing.

Related Documents:

- A. Order Pursuant to Local Rule 9006-1(e) Shortening the Time for Notice of the Hearing to Consider the Debtors' Motion for an Order, Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, Authorizing the

Debtors to (I) (A) Retain Development Specialists, Inc. as Their Restructuring Advisor, (B) Designate Bradley D. Sharp as Chief Restructuring Officer, *Nunc Pro Tunc* to January 26, 2018 and (C) to Utilize Additional DSI Personnel; and (II) Approving the agreement Related Thereto [Docket No. 523, 2/8/18]

- B. **Notice of Filing of Revised Proposed Order, Pursuant to 105(a) and 363(b) of the Bankruptcy Code, Authorizing the Debtors to (I)(A) Retain Development Specialists, Inc. as Their Restructuring Advisor, (B) Designate Bradley D. Sharp as Chief Restructuring Officer, *Nunc Pro Tunc* to January 26, 2018, and (C) to Utilize Additional DSI Personnel; and (II) Approving the Agreement Related Thereto [Docket No. 565, 2/13/18]**

Objections/Responses Received:

- A. Informal comments of the U.S. Trustee
- B. **Informal comments of the Securities and Exchange Commission**
- C. **Objection of Betty Lu Dunne, Marjorie and Steven Tandlich, Patricia S. and Kent A. Fletcher, Elizabeth Cruz, Leonard Simons, Robert Schattner, Lori and Lloyd Feldman to Debtors' Motion for Entry of 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; (V) Authorizing Debtors to (A) Retain Development Specialists, Inc. ("DSI") as Their Restructuring Advisor, (B) Designate Bradley D. Sharp as Chief Restructuring Officer, (C) Utilize Additional DSI Personnel, and (D) Retain Frederick Chin as Chief Executive Officer [Docket No. 562, 2/13/18]**

Status: The Debtors **have filed** a revised proposed form of order that addresses the U.S. Trustee's **and the SEC's** informal comments. This matter will be going forward.

5. Debtors' Motion Under Bankruptcy Code Sections 105(a) and 363(b) for Authorization to Employ and Retain Frederick Chin as Chief Executive Officer *Nunc Pro Tunc* to January 29, 2018 [Docket No. 514, 2/7/18]

Objection Deadline: Objections may be presented at the time of the hearing.

Related Documents:

- A. 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 Under Bankruptcy Code Sections 105(a) and 363(b) for Authorization to Employ and Retain Frederick Chin as Chief Executive Officer *Nunc Pro Tunc* to January 29, 2018 [Docket No. 524, 2/8/18]
- B. **Declaration of Frederick Chin in Support of Debtors' Motion Under 105(a) and 363(b) for Authorization to Employ and Retain Frederick Chin as Chief Executive Officer *Nunc Pro Tunc* to January 29, 2018 [Docket No. 564, 2/13/18]**

Objections/Responses Received:

- A. Informal response of the U.S. Trustee
- B. **Objection of Betty Lu Dunne, Marjorie and Steven Tandlich, Patricia S. and Kent A. Fletcher, Elizabeth Cruz, Leonard Simons, Robert Schattner, Lori and Lloyd Feldman to Debtors' Motion for Entry of 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; (V) Authorizing Debtors to (A) Retain Development Specialists, Inc. ("DSI") as Their Restructuring Advisor, (B) Designate Bradley D. Sharp as Chief Restructuring Officer, (C) Utilize Additional DSI Personnel, and (D) Retain Frederick Chin as Chief Executive Officer [Docket No. 562, 2/13/18] (*see item 4C (Objections/Responses) above*)**

Status: This matter will be going forward.

CONTESTED MATTERS GOING FORWARD

- 6. 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. 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]
- C. Order (A) Authorizing the Debtors to Make Additional Critical Vendor Payments, (B) Approving Certain Payments Previously Made, and (C) Authorizing the Bank to Honor and Process Checks and Electronic Transfer Requests Related to the Foregoing [Docket No. 362, 1/23/18]

Objections/Responses Received:

- A. Omnibus Response and Reservation of Rights of the Ad Hoc Noteholder Group Formed Pursuant to January 23, 2018, Order With Respect to (I) DIP Financing Motion and (II) Critical Vendor Motion [D.I. 510, 2/6/18]
- B. Omnibus Reservation of Rights of the Official Committee of Unitholders [D.I. 518, 2/7/18]

Status: This matter is adjourned to March 8, 2018 at 10:00 a.m. (ET).

- 7. 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: February 6, 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]
- H. Third Interim Order on Emergency Motion for: Entry of 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. 363, 1/23/18]
- I. Notice of Entry of Third Interim DIP Order and Final Hearing on Proposed DIP Financing [Docket No. 370, 1/23/18]
- J. Notice of Filing of Fourth Interim Order on Debtors' Motion for Entry of 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. 557, 2/12/18]
- K. **Objection of Betty Lu Dunne, Marjorie and Steven Tandlich, Patricia S. and Kent A. Fletcher, Elizabeth Cruz, Leonard Simons, Robert Schattner, Lori and Lloyd Feldman to Debtors' Motion for Entry of 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; (V) Authorizing Debtors to (A) Retain Development Specialists, Inc. (“DSI”) as Their Restructuring Advisor, (B) Designate Bradley D. Sharp as Chief Restructuring Officer, (C) Utilize Additional DSI Personnel, and (D) Retain Frederick Chin as Chief Executive Officer [Docket No. 562, 2/13/18] (see item 4C (Objections/Responses) above)

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] (the “Hehn Limited Objection”)

- 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]
- I. Omnibus Response and Reservation of Rights of the Ad Hoc Noteholder Group Formed Pursuant to January 23, 2018, Order [D.I. 357] with Respect to (I) DIP Financing Motion and (II) Critical Vendor Motion [D.I. 510, 2/6/18]
- J. Omnibus Reservation of Rights of the Official Committee of Unitholders [D.I. 518, 2/7/18]
- K. Objection regarding Third Interim DIP Order and Final Hearing on Proposed DIP Financing Filed by Ruth Cloonan [Docket No. 540, 2/9/18]

Status: The Hehn Limited Objection is resolved. This matter will be going forward on a further interim basis.

- 8. 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 [Docket No. 458, 2/1/18]

Objection Deadline: February 9, 2018 at 12:00 p.m. (ET)

Related Documents:

- A. Corrected Declaration of Bradley D. Sharp in Support of Debtor’s Motion to Sell 8692 Franklin Avenue, Los Angeles, California Property [Docket No. 462, 2/1/18]

- B. 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 [Docket No. 465, 2/2/18]
- C. Notice of Filing of Addendum to Purchase Agreement [Docket No. 474, 2/2/18]
- D. Notice of Filing of Amended Proposed Order [Docket No. 527, 2/8/18]
- E. Notice of Filing of Further Revised Proposed 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 [Docket No. 558, 2/12/18]

Objections/Responses Received:

- A. Informal comments of the Noteholder Group

Status: The Debtors have further revised the proposed order in light of the informal comments provided by the Noteholder Group. With these revisions, the matter will be going forward on a fully consensual basis so that the Noteholder Group may make certain representations on the record.

Dated: Wilmington, Delaware
February 13, 2018

/s/ Ian J. Bambrick

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