

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

In Re:

WOODBRIIDGE GROUP OF
COMPANIES, LLC, et al.

Debtors

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

LEON KROUS DRILLING, INC.'S MOTION PURSUANT TO DEL. BANKR.LR. 9006-1(e) FOR AN ORDER SHORTENING NOTICE FOR THE MOTION OF LEON KROUS DRILLING, INC. 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)

Leon Krous Drilling, Inc., ("Leon") 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 the 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 Leon 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 t he Motion to Shorten Notice Leon relies upon its Motion for Relief from Stay and further states as follows:

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.O. except by Order of this Court, on written motion (served on all interested parties) specifying the exigencies justifying shortened notice. The Court will rule on such motion promptly and without need for hearing."

2. The Debtors filed their Petition 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 Petition 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 time lock 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, Leon ascertained that one or more Debtors were the owners of record of the Property for which Leon supplied drilling services for construction and improvement of the Property and upon whom a mechanic's lien must be filed no later than March 11, 2018, in order to insure the preservation of the rights of Leon Krous Drilling.

4. Counsel for Leon 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. Leon is owed \$321,165.06 for drilling services provided at the Property for Construction and Improvements to the Property. The last date of services made by Leon was on December 11, 2017.

6. In order to insure that Leon timely proceeds to file and perfect its Mechanic's Lien against the Debtors, Crest must obtain Relief from Stay prior to March 11, 2018 as further explained in the Motion for Relief filed simultaneously herewith.

7. Motions must generally be filed and served twenty-one (21) days before the hearing as set forth in Local R. of Bankr. P. 9006-01(c), however, the Motion for Relief from Stay should be heard on shortened notice. Leon request that the hearing on the Motion for Relief from Stay be as soon as possible, but in any event before March 11, 2018.¹

¹ The Court's Docket reflects that an omnibus hearing is scheduled for March 7, 2018 at 11:00 a.m.

8. Leon 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 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, Leon submits that no other or further notice is necessary.

WHEREFORE, Leon Krous Drilling, Inc. moves this Honorable Court to enter an Order: (i) scheduling a hearing on the Motion for Relief From Stay prior to March 11, 2018, to preserve the status quo; (ii) approving notice as set forth above; (iii) granting such further relief as is just and equitable.

Dated: March 1, 2018

Respectfully submitted,

The Law Office of James Tobia, LLC

By: /s/ James Tobia

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FOR THE DISTRICT OF DELAWARE

In re:

WOODBIDGE GROUP OF
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Chapter 11
Case # 17-12560(KJC)
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**ORDER GRANTING LEON KROUS DRILLING, INC'S 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 Leon Krous Drilling Inc.'s Motion Pursuant to Del.
Bankr. L.R. 90061(e) for an Order Shortening Notice (the "Motion to Shorten Notice")
with Respect to Leon Krous Drilling, Inc.'s 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 March 7, 2018 at 11:00 a.m. at the United States Bankruptcy Court for
the District of Delaware, 824 Market Street, 5th Floor, Courtroom #5, Wilmington,
Delaware 19801;

ORDERED THAT, objections, if any, to the Motion for Relief from Stay are
due at the time of hearing and it is further

ORDERED THAT, Leon Krous Drilling, Inc. 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: _____

By: _____

KEVIN J. CAREY
U.S. BANKRUPTCY JUDGE