

**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

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MARCH 8, 2018, AT 11:00 A.M. (ET)**

**PLEASE NOTE THE DATE OF THE HEARING HAS BEEN CHANGED
FROM MARCH 7, 2018, AT 11:00 A.M. (ET) TO MARCH 8, 2018 AT 11:00 A.M. (ET)**

ADJOURNED/RESOLVED MATTERS

1. Debtors' Motion for Entry of an Order Pursuant to Sections 105(a), 365(a), and 554 of the Bankruptcy Code, Authorizing Rejection of Unexpired Lease of Non-Residential Real Property (14225 Ventura Blvd., Suite 100) *Nunc Pro Tunc* to January 31, 2018, and Abandonment of Any Remaining Property Located at Location Covered by Such Lease [Docket No. 448, 1/31/18]

Objection Deadline: February 14, 2018, at 4:00 p.m. (ET)

Related Documents:

- A. Certificate of No Objection [Docket No. 611, 2/16/18]
- B. Order, Pursuant to Sections 105(a), 365(a), and 554 of the Bankruptcy Code, Authorizing Rejection of Unexpired Lease of Non-Residential Real Property (14225 Ventura Blvd., Suite 100) *Nunc Pro Tunc* to January 31, 2018, and Abandonment of Any Remaining Property Located at Location Covered by Such Lease [Docket No. 621, 2/20/18]

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 14140 Ventura Boulevard #302, 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 items appear in bold.**

Objections/Responses Received: None

Status: An order has been entered. No hearing is required.

2. 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)

Related Document:

- A. Notice of Withdrawal of Motion [Docket No. 678, 3/1/18]

Objections/Responses Received: None

Status: This matter has been withdrawn.

3. Debtors' Motion for an Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing the Debtors to Retain Electronic Discovery Litigation Support Provider *Nunc Pro Tunc* as of December 24, 2017 [Docket No. 478, 2/2/18]

Objection Deadline: February 16, 2018, at 4:00 p.m. (ET),

Related Documents:

- A. Certificate of No Objection [Docket No. 638, 2/22/18]
- B. Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing the Debtors to Retain Electronic Discovery Litigation Support Provider *Nunc Pro Tunc* as of December 24, 2017 [Docket No. 644, 2/22/18]

Objections/Responses Received: None

Status: An order has been entered. No hearing is required.

UNCONTESTED MATTER WITH CERTIFICATE OF NO OBJECTION

4. Debtors' Motion for an Order Extending the Time Within Which the Debtors Must File Their Schedules of Assets and Liabilities, Statement of Financial Affairs, and Rule 2015.3 Report [Docket No. 582, 2/14/18]

Objection Deadline: February 28, 2018, at 4:00 p.m. (ET), extended to March 1, 2018, for the Noteholders' Group

Related Documents:

A. Certificate of No Objection [Docket No. 690, 3/2/18]

B. Order Extending the Time Within Which the Debtors Must File Their Schedules of Assets and Liabilities, Statement of Financial Affairs, and Rule 2015.3 Report [Docket No. 700, 3/5/18]

Objections/Responses Received: None

Status: An order has been entered. No hearing is required.

UNCONTESTED MATTERS GOING FORWARD

5. Application of the Fiduciary Committee of Unitholders for an Order, Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Venable LLP as Counsel *Nunc Pro Tunc* to January 23, 2018 [Docket No. 615, 2/16/18]

Objection Deadline: February 28, 2018, at 4:00 p.m. (ET)

Related Documents:

A. Certification of Counsel Regarding Application of the Fiduciary Committee of Unitholders for an Order, Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Venable LLP as Counsel *Nunc Pro Tunc* to January 23, 2018 [Docket No. 706, 3/6/18]

Objections Filed: None

Status: A certification of counsel has been filed. No hearing is required.

6. Debtors' Motion for Entry of an Order, Pursuant to Section 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019, Authorizing and Approving the Debtors' Entry into a Consent Order with California with Respect to the Offer or Sale of Securities [Docket No. 639, 2/21/18]

Objection Deadline: March 5, 2018, at 12:00 p.m. (ET)

Related Document:

A. Order Pursuant to Local Rule 9006-1(e) Shortening the Time for Notice of the Hearing to Consider the Debtors' Motion for Entry of an Order, Pursuant to Section 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019, Authorizing and Approving the Debtors' Entry into a Consent Order with California with Respect to the Offer or Sale of Securities [Docket No. 643, 2/22/18]

B. Certificate of No Objection [Docket No. 708, 3/6/18]

C. Proposed Order

Objections Filed: None as of the filing of this Agenda

Status: **A certificate of no objection has been filed. No hearing is required.**

7. Motion of Leon Krous Drilling, Inc. for Limited Relief From the Automatic Stay [Docket No. 681, 3/1/18]

Objection Deadline: At the hearing

Related Document:

- A. Order Granting Leon Krous Drilling, Inc.'s Motion Pursuant to Del. Bankr. L.R. 9006-1(e) for an Order Shortening Notice for the Motion of Leon Krous Drilling, Inc. for Limited Relief From the Automatic Stay [Docket No. 688, 3/1/18]
- B. **Notice of Motion of Leon Krous Drilling, Inc. for Limited Relief from the Automatic Stay [Docket No. 701, 3/5/18]**

Objections Filed: None as of the filing of the Agenda

Status: **The movant and the Debtors have agreed upon the proposed form of order. In light of the objection deadline, this matter will be going forward.**

CONTESTED MATTERS GOING FORWARD

8. 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]
- D. Notice of Filing of Final 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 and Process Checks and Electronic Transfer Requests Related to the Foregoing [Docket No. 695, 3/5/18]

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 will be going forward.

- 9. 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 28, 2018, at 4:00 p.m. (ET), extended to March 1, 2018, for the Noteholders' Group.

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. Supplemental Declaration of Lawrence R. Perkins [Docket No. 84, 12/15/17]
- E. 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]
- F. 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]
- G. Fourth Interim Order on Debtors' Motion 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. 572, 2/13/18]
- H. Notice of Entry of Fourth Interim DIP Order and Final Hearing on Proposed DIP Financing [Docket No. 578, 2/14/18]
- I. Notice of Filing of Final Order on Debtors' Motion 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. 686, 3/1/18]
- J. Notice of Filing of Final Order on Debtors' Motion 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. 687, 3/1/18]

- K. Debtors' Reply in Support of Motion for Final Order Authorizing Post-Petition Financing [Docket No. 697, 3/5/18]
- L. Declaration of Frederick Chin in Support of Debtor's Motion for a Final Order Approving Postpetition Secured Financing [Docket No. 698, 3/5/18]
- M. **Notice of Filing of Revised Final Order on Debtors' Motion 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. 709, 3/6/18]**

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]
- L. 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 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);

(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 Hehn Limited Objection is resolved. This matter will be going forward on a final basis.

10. 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 United States Trustee, the Committee, the SEC, the Ad Hoc Noteholders Groups, and the Ad Hoc Unitholders Group 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]
- 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: By agreement of the parties, this matter is adjourned to the next hearing on March 28, 2018, at 9:00 a.m. (ET).

- 11. 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: February 13, 2018 (at 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]
- C. Declaration of Matthew Diaz in Support of 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 [D.I. 693, 3/2/18]

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 9L (Objections/Responses) above*)

Status: This matter will be going forward.

12. Tintarella LLC's Motion for Relief From the Automatic Stay and/or for Adequate Protection [Docket No. 529, 2/8/18]

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

Related Documents:

- A. Declaration of James Bowen in Support of Tintarella LLC's Motion for Relief From the Automatic Stay [Docket No. 531, 2/8/18]
- B. Declaration of Penny Flinn in Support of Tintarella LLC's Motion for Relief From the Automatic Stay [Docket No. 532, 2/8/18]
- C. Declaration of Arthur Gimmy in Support of Tintarella LLC's Motion for Relief From the Automatic Stay [Docket No. 533, 2/8/18]
- D. Order Denying Shortening Notice and Objections Periods for Motion for Relief from the Automatic Stay [Docket No. 556, 2/12/18]
- E. Notice of Entry of Order Denying Shortened Notice and Objections Periods and 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 [Docket No. 583, 2/14/18]
- F. Notice of Deposition Upon Oral Examination of Designated Representative(s) of the Debtors Related to Tintarella's Motion for Relief from the Automatic Stay and/or for Adequate Protection [Docket No. 584, 2/15/18]

Objections/Responses Received:

A. Letter to the Honorable Kevin J. Carey [Docket No. 658, 2/27/18]

Status: This matter will be going forward as a status conference and the parties anticipate submitting a consensual form of order to the Court resolving, in part, the adequate protection portion of the Motion.

Dated: March 6, 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)
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 for the Debtors and Debtors in Possession

-and-

KLEE, TUCHIN, BOGDANOFF & STERN LLP
Kenneth N. Klee (admitted *pro hac vice*)
Michael L. Tuchin (admitted *pro hac vice*)
David A. Fidler (admitted *pro hac vice*)
Jonathan M. Weiss (admitted *pro hac vice*)
1999 Avenue of the Stars, 39th Floor
Los Angeles, California 90067
Tel: (310) 407-4000
Fax: (310) 407-9090

*Proposed Counsel for the Debtors and
Debtors in Possession*