

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

In re

WOODBIDGE GROUP OF COMPANIES, LLC,
et al.,

Debtors.

Chapter 11

Case No. 17-12560-KJC

**NOTICE BY D&D CONSTRUCTION SPECIALTIES, INC. OF PERFECTION OF
CLAIM OF MECHANIC'S LIEN UNDER 11 U.S.C. §§546(b) AND 362(b)(3);
DEMAND FOR COMPLIANCE WITH 11 U.S.C. §363**

YOU ARE HEREBY NOTIFIED that, pursuant to 11 U.S.C §546(b), Claimant D & D Construction Specialties, Inc., a California corporation (hereinafter "D&D" or "Claimant"), perfects the mechanic's lien recorded on December 13, 2017 in the County of Los Angeles Recorder's Office as Document No. 20171446938 against the real property commonly known as 1484 Carla Ridge, Beverly Hills, California 90210, APN 4391-023-010 (the "Property").

D&D's mechanic's lien on the Property is in the amount of \$75,542.50 plus interest and other charges for drill rig and related services, per that certain contract with KG Mullen, Inc., dated September 14, 2017, as approved by I Grace Company. A true and correct copy of the recorded mechanic's lien is attached hereto as Exhibit "A."

Pursuant to 11 U.S.C. §546(b), this pleading shall serve as notice to Hornbeam Investments, LLC, as the purported owner of the property mentioned in the mechanic's lien ("Owner") and to the Debtors herein that, notwithstanding the automatic stay of 11 U.S.C. §362, D&D hereby perfects its claim to foreclose its mechanic's lien, as may be required by the California *Civil Code*. Accordingly, in light of this notice, Owner, Debtors and other parties in interest are hereby estopped from claiming that the lawsuit to foreclose the above referenced mechanic's lien was not timely commenced pursuant to the California *Civil Code*.

Additionally, Debtors and Owner are hereby notified of D&D's perfection of its interest in the Property pursuant to 11 U.S.C. §546(b) and §362(b)(3) and, in lieu of seizure of any property or commencement of an action, to whatever extent such seizure or commencement may be necessary to accomplish a perfection of D&D's interest in the Property. Such notice does not constitute, and this record of such notice does not constitute an admission as to the necessity of any such seizure or commencement. Furthermore, D&D claims all rents, issues, profits or other monies or property that may be generated by the underlying real property, including, without limitation, refunds of deposits with governmental agencies or monies received as a result of a condemnation or similar proceeding, and all proceeds thereof, to be the cash collateral of D&D and does not consent to the use of such monies by the Owner or Debtors for any purpose. D&D also hereby makes demand for full compliance by Owner and Debtors with the requirements of 11 U.S.C. §363 regarding the segregation, accounting and prohibition of use of all of D&D's cash collateral.

This pleading shall also serve as notification that Claimant, to the extent not already done, intends to cease any work relating to the Property. D&D understands that the Owner, Debtors or others nonetheless may continue development of the Property during the pendency of the bankruptcy cases.

Dated: March 12, 2018

SulmeyerKupetz
a professional corporation

/s/Alan G. Tippie
Alan G. Tippie
333 South Hope Street, 35th Floor
Los Angeles, CA 90071
Tel: (213) 626-2311
Fax: (213) 629-4520
Email: atippie@sulmeyerlaw.com

Counsel for D & D Construction Specialties, Inc.

EXHIBIT A

This page is part of your document - DO NOT DISCARD



20171446938



Pages:
0004

Recorded/Filed in Official Records
Recorder's Office, Los Angeles County,
California

12/13/17 AT 11:17AM

FEES:	24.00
TAXES:	0.00
OTHER:	0.00
PAID:	24.00



LEADSHEET



201712130730013

00014647027



008784194

SEQ:
03

DAR - Counter (Upfront Scan)



THIS FORM IS NOT TO BE DUPLICATED

RECORDING REQUESTED BY

D&D Construction Specialties, Inc.

WHEN RECORDED MAIL TO:

NAME D&D Construction Specialties, Inc.
MAILING ADDRESS 11043 Olinda Street
CITY, STATE, ZIP CODE Sun Valley, CA 91352



SPACE ABOVE THIS LINE RESERVED FOR RECORDER=S USE

MECHANIC'S LIEN

The undersigned, D&D Construction Specialties, Inc., claimant, does hereby claim a mechanic's lien upon the following described real property located in the: City of Malibu, County of Los Angeles, California, and commonly known as: 1484 Carla Ridge, Beverly Hills, CA 90210 (APN #4391-023-010).

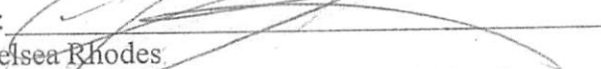
The sum of \$75,542.50 together with interest thereon at the rate of 18 percent per annum from September 29, 2017 is due to claimant (after deducting all just credits and offsets) for the following work and material furnished by claimant: drill borings..

Claimant furnished the work and materials at the request of, or under contract with: KG Mullen Inc.

The owner(s) and reputed owner(s) of the property are: Hornbeam Investments LLC, 136 El Camino Dr. #412, Beverly Hills, CA 90212 .

D&D CONSTRUCTION SPECIALTIES, INC.

Dated: **DEC 13 2017**

By: 
Chelsea Rhodes
secretary of D&D Construction Specialties, Inc.

VERIFICATION

I, the undersigned, declare: I am the secretary of the claimant of the foregoing mechanic's lien. I read said claim of mechanic's lien, know the contents thereof and the same is true of my own knowledge. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **DEC 13 2017** at Sun Valley, California.


Chelsea Rhodes

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18.
My business address is: 11043 Olinda Street, Sun Valley, CA 91352

On **DEC 13 2017** I served the foregoing document described as:

MECHANIC'S LIEN

on the owner or reputed owner of the real property described therein by placing a true copy thereof enclosed in the sealed envelope and addressed as follows:

KG Mullen Inc.
PO Box 1228
Venice, CA 90294

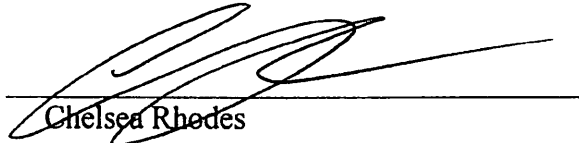
I Grace Company
1964 Westwood Blvd., #425
Los Angeles, CA 90025

Hornbeam Investments LLC
136 El Camino Dr., #412
Beverly Hills, CA 90212

I deposited such envelope with the U.S. Postal Service at Sun Valley, California. The envelope was mailed with first-class postage thereon fully prepaid.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: **DEC 13 2017**.


Chelsea Rhodes

**NOTICE OF MECHANIC'S LIEN
ATTENTION!**

Upon recording of the enclosed MECHANIC'S LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date of the mechanic's lien is recorded.

The party identified in the mechanic's lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanic's lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for the unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanic's lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANIC'S LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEB SITE AT www.cslb.ca.gov.