

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

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

**Re: Docket No. 828**

**STATEMENT OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS IN SUPPORT OF PLAN TERM SHEET**

The Official Committee of Unsecured Creditors (the “Official Committee”)

appointed in the above-captioned cases hereby files this statement in support of the *Plan Term Sheet* dated March 22, 2018 (the “Plan Term Sheet”),<sup>2</sup> which was filed with the Court by Woodbridge Group of Companies, LLC and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) as part of that certain *Notice of Submission of Summary Plan Term Sheet Entered Into By the Debtors, the Official Committee of Unsecured Creditors, the Ad Hoc Noteholder Group, and the Ad Hoc Unitholder Group* [Docket No. 828].

1. From the first day that the Official Committee was appointed in these cases, its goals were to preserve and maximize value for the general unsecured creditors, including the noteholders and trade creditors. Critically, the Official Committee also recognized

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<sup>1</sup> 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](http://www.gardencitygroup.com/cases/WGC), or by contacting the undersigned counsel for the Debtors.

<sup>2</sup> Capitalized terms not defined herein shall have the meanings set forth in the Plan Term Sheet.

the need to push these cases along as fast as possible to not only reduce the administrative burn that is inherent with all bankruptcy cases, but also to enable a clear path and mechanism for the return of capital to its constituency, especially the investors, many of whom invested a significant amount of their life savings. With these goals front and center, the Official Committee actively participated in the negotiation of the Plan Term Sheet with the Debtors, the Ad Hoc Secured Noteholders Committee,<sup>3</sup> and the Ad Hoc Unitholders Committee. The negotiations were intense and conducted over multiple days, in good faith and at arms' length. In the Official Committee's view, the Plan Term Sheet achieves its objectives of: (i) preserving and maximizing value to unsecured creditors, (ii) reducing the administrative burn in these estates; and (iii) providing a definitive structure for the return of capital to its constituency. The resolutions in the Plan Term Sheet also eliminate what would have been substantial additional costs and delay associated with protracted litigation over, among other issues, the secured status of noteholders, the priority and characterization of unitholder claims, the merits of substantive consolidation, and post-confirmation governance and control issues. Accordingly, the Official Committee supports the terms set forth in the Plan Term Sheet.

2. Under the Plan Term Sheet and certain business projections made available to the Official Committee by the Debtors, and evaluated by the Official Committee, that are based on numerous assumptions, which are preliminary and subject to change based on a variety of factors, including, but not limited to, the inherent uncertainty of real estate values and

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<sup>3</sup> The Ad Hoc Secured Noteholders Committee was appointed in order to evaluate and pursue the interests of noteholders in their capacity as secured creditors. The Official Committee represents noteholders in their capacity as unsecured creditors, and firmly believes that all noteholders are unsecured as any purported security interest held by a noteholder is unperfected and void or voidable.

development costs, and the nature and extent of allowed claims, the Official Committee currently estimates that creditor constituents may realize the following recoveries over the period that it will take to liquidate the Debtors' estates (which is estimated to be over a period of one (1) year to just over three (3) years from the Effective Date of a plan of reorganization, depending on the Debtors' business plan. Depending on the Debtors' ultimate business plan, the longer period of time to liquidate the Debtors' real estate assets, the larger the anticipated recovery to noteholders and unitholders):

- a. Noteholders may realize a recovery in the range of 62% to 76% on account of their allowed claims.<sup>4</sup>
- b. Unitholders may realize a recovery in the range of 45% to 55% on account of their allowed claims (after taking into account the 72.5% co-efficient described in the Plan Term Sheet (the "Unitholder Allowed Claim").
- c. Trade creditors may realize up to a 100% recovery on account of their allowed claims.<sup>5</sup>

3. The estimates provided herein are preliminary estimates of potential recoveries:<sup>6</sup> (i) based on the monetization of real estate assets and do not include potentially additional recoveries from the monetization of other assets, such as litigation claims against,

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<sup>4</sup> Under the Plan Term Sheet, allowed claims are determined by reference to the principal amount of notes or units held by the claimant as of the Petition Date, *minus* any prepetition distributions received by such claimant on account of interest and/or dividends and excluding repayment of principal.

<sup>5</sup> Contractors also will benefit from the Plan Term Sheet through the funding of certain ongoing real estate projects. Completion of such projects will maximize the value of the Debtors' estates for the benefit of all constituents.

<sup>6</sup> The Effective Date of the Debtors' Plan is anticipated to occur before calendar year-end 2018 and the initial target distribution to noteholders on the Effective Date is ten percent (10%) of a noteholder's allowed claim and on a Unitholder's Allowed Claim.

among others, Robert Shapiro and brokers, who may have culpability to the noteholders and unitholders; and (ii) that are being provided for informational purposes only and should not be construed as a solicitation of support in connection with the Plan Term Sheet. Such estimates are forward-looking statements and are subject to risks and uncertainties that may cause the actual results to differ materially. Factors that could affect actual results, include, but are not limited to, (a) potential delays in the timing of monetizing the real estate, (b) potentially higher costs to complete such monetization, (c) possible changes in the applicable real estate markets affecting available values for the real estate assets, (d) potential increases in interest rates and in real estate development costs, and (e) other risk factors relating to the monetization of the real estate and the wind-down of the Debtors' business. No person or entity should place undue reliance on these forward-looking statements, which are based exclusively on information and projections currently available to the Official Committee.

4. For the reasons set forth above, the Official Committee firmly supports the Plan Term Sheet and looks forward to promptly confirming a chapter 11 plan in these cases consistent with the Plan Term Sheet.

Dated: March 27, 2018

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FOR THE DISTRICT OF DELAWARE**

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COMPANIES LLC, <i>et al.</i> ,	:	Case No. 17- 12560 (KJC)
	:	
Debtors.	:	(Jointly Administered)
<hr/>	:	

**CERTIFICATE OF SERVICE**

I, Colin R. Robinson, hereby certify that on the 27th day of March, 2018, I caused a copy of the documents listed below to be served on the individuals on the attached service list in the manner indicated:

**Statement of the Official Committee of Unsecured Creditors in  
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