

Aspen Glen Assisted Living

448 Bookeiff Drive • Grand Junction, CO. 81501 • Phone: 970-210-6642 • Fax: 970-2551613
E-Mail: aspen_glen@yahoo.com

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CLERK
U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

January 15, 2020

United States Bankruptcy Court
District of Delaware
Case 19-50858-BLS
824 N Market Street, 3rd Floor
Wilmington, DE 19801

To Whom It May Concern:

I am writing in response to a summons sent to our bookkeeper and Received December 13th, 2020 from Woodbridge Group of Companies LLC. c/o GCG, PO Box 10545 Dublin, Ohio 43017-0208.

Where as MICHAEL GOLDBERG/WOODBRIDGE GROUP OF COMPANIES, LLC filed a complaint against ASPEN GLEN, INC.; CLUBCORPS, INC., in action of fraudulent transfers that occurred.

ASPEN GLEN, INC, holds no affiliation or conduct of transaction with CLUBCORPS HOLDINGS, INC. and has had conducted no business or investments, or received any transfers of funds from WOODBRIDGE GROUP OF COMPANIES LLC. And fully DENIES all complaints of stated actions as witnessed subsequently.

December 10th, 2019 PACHULSKI STANG ZIEHL & JONES LLP (plaintiff's law firm) was contacted by my self, Lenard MacLeod of Aspen Glen Assisted Living, by phone. I was connected with Mr. Colin R. Robinson who stated he was handling case 19-50858 for the Woodbridge Group of Companies LLC. I informed him that their law firm had mistaken our company for one in Carbondale, Colorado and had failed to perform due diligence. I shared the information that I had found that indeed they were looking for Aspen Glen Golf Course in Carbondale, Colorado who shares affiliation with CLUBCORP, INC. Robinson was notified that ASPEN GLEN, INC was a small in home assisted living in Grand Junction, Colorado. Further that ASPEN GLEN, INC. is able to prove that it had never received any of the deposits or transfers as entered by the plaintiff as evidence to the court, and held no affiliations with CLUBCORP or WOODBRIDGE GROUP OF COMPANIES LLC. Mr. Robinson assured me that he would "look into it" and amend the summons if that were the case.

December 13th, 2019 I received an amended summons that reflected APEN GLEN, INC.; CLUBCORP HOLDINGS, INC., (defendants). PACHULSKI STANG ZIEHL & JONES LLP (plaintiff's law firm) was contacted by phone I spoke with Colin R. Robinson again who assured me they were fixing the mistake and I would hear form them within the week and that I did not need to answer the Courts' "summons of a response" as they would be removing me from the complaint and fixing their mistake.

December 31st, 2019 PACHULSKI STAN G ZIEHL & JONES LLP (plaintiff's law firm) was contacted by phone I spoke with Colin R. Robinson. At that time I was reassured once again by Mr. Robinson, that their firm was performing their due diligence and that I would receive a letter and documentation by mail, and reassurance that I was to be removed from the court case involving WOODBRIDGE GROUP OF COMPANIES LLC., (plaintiff) and CLUBCORP HOLDINGS, INC. (defendant). Mr. Robinson once again, was convincing in assuring me that I need not answer the summons and further that no response to the Court was necessary. Mr. Robinson affirmed that he had handled.

January 13th, 2020 PACHULSKI STANG ZIEHL & JONES LLP (plaintiff's law firm) was contacted by phone I left a voice message with Colin R. Robinson notifying him that ASPEN GLEN, INC. had received NO filings from the court, NO documents or emails guaranteed by him at our last discussion. I notified Mr. Robinson once again of his law firm's Failure to Perform Due Diligence, and that ASPEN GLEN, INC. was in no way affiliated with the complaint. I voiced my upset as to his failure to follow through with his agreement to remove ASPEN GLEN, INC. from the complaint as sworn. I requested that he call me to immediately resolve the problem. No calls or contact from Mr. Robinson or his firm have been received.

I appeal to the court that ASPEN GLEN, INC. be removed from the complaint and summons as we have had no association, contact or have conducted any business, investments, or received any funds with or from WOODBRIDGE GROUP OF COMPANIES LLC., (plaintiff) and or CLUBCORP HOLDINGS, INC.. I petition for the court's leniency in response to the lateness of this letter as above witnessed, that I was coerced and manipulated by the Plaintiff's representation Colin R. Robinson, that no such action was necessary and that PACHULSKI STANG ZIEHL & JONES LLP (plaintiff's law firm) and Mr. Robinson himself would amend the mistake.

Sincerely,

A handwritten signature in black ink, appearing to read "Lenard MacLeod". The signature is highly stylized and cursive, with large loops and flourishes.

Lenard MacLeod
Vice-President
Aspen Glen Assisted Living