

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

	:	
In re:	:	Chapter 11
	:	Case No. 17-12560 (KJC)
WOODBRIIDGE GROUP OF	:	
COMPANIES LLC, <i>et al.</i> <sup>1</sup>	:	Jointly Administered
	:	
Debtors.	:	<b>Re: Dkt. Nos. 890, 1585, 1656</b>

**JOINDER OF THE OFFICAL AD HOC COMMITTEE OF UNITHOLDERS TO  
DEBTORS’ OBJECTION TO MOTION TO QUASH OF CONTRARIAN FUNDS, LLC**

The Official Ad Hoc Committee of Unitholders (the “Unitholders’ Committee”) of Woodbridge Mortgage Investment Fund Entities,<sup>2</sup> by and through its undersigned counsel, hereby submits this Joinder to the *Debtors’ Objection to Motion to Quash of Contrarian Funds, LLC* [Dkt. No. 1656] (the “Objection”), and in support thereof, respectfully states as follows:

1. On April 3, 2018, Contrarian Funds, LLC (“Contrarian”) filed its *Motion for Authority to Acquire Promissory Notes* [Dkt. No. 890] (the “Notes Motion”).
2. On April 10, 2018, the Debtors filed its notice to conduct a Rule 30(b)(6) deposition of a representative of Contrarian [Dkt. No. 954] (the “Deposition Notice”).
3. In response, on April 18, 2018, Contrarian filed a *Motion to Quash of Contrarian Funds, LLC* [Dkt. No. 1585] (the “Motion to Quash”), seeking to quash the Deposition Notice.

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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 14225 Ventura Boulevard, #100, Sherman Oaks, California 91423. A complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses may be obtained on the website of the Debtors’ claims and noticing agent at [www.gardencitygroup.com/cases/WGC](http://www.gardencitygroup.com/cases/WGC).

<sup>2</sup> The Funds consist of the following Debtors: (i) Woodbridge Mortgage Investment Fund 1, LLC; (ii) Woodbridge Mortgage Investment Fund 2, LLC; (iii) Woodbridge Mortgage Investment Fund 3, LLC; (iv) Woodbridge Mortgage Investment Fund 3A, LLC; (v) Woodbridge Mortgage Investment Fund 4, LLC; (vi) Woodbridge Commercial Bridge Loan Fund 1, LLC; and (vii) Woodbridge Commercial Bridge Loan Fund 2, LLC.

4. At a hearing held on April 23, 2018, the Court scheduled the Motion to Quash for hearing on May 1, 2018, and the Notes Motion for hearing on June 5, 2018.

5. On April 26, 2018, the Debtors filed the Objection [Dkt. No. 1656].

6. The Unitholders' Committee joins the Objection and supports the Debtors' ability to seek limited discovery from Contrarian in connection with the Notes Motion.

7. For all the reasons set forth in the Objection, the Unitholders' Committee respectfully requests that this Court: (i) deny the Motion to Quash; (ii) permit the Debtors to take targeted, appropriate discovery concerning the Notes Motion; and (iii) grant such other and further relief as is just and appropriate.

Dated: April 26, 2018  
Wilmington, Delaware

**VENABLE LLP**

*/s/ Jamie L. Edmonson*

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Jamie L. Edmonson (No. 4247)  
Daniel A. O'Brien (No. 4897)  
1201 N. Market Street, Suite 1400  
Wilmington, Delaware 19801  
Telephone: 302-298-3535  
Facsimile: 302-298-3550  
E-mail: jledmonson@venable.com  
daobrien@venable.com

-and-

Jeffrey S. Sabin  
1270 Avenue of the Americas  
New York, New York 10020  
Telephone: 212-307-5500  
Facsimile: 212-307-5598  
E-mail: jssabin@venable.com

-and-

Andrew J. Currie  
600 Massachusetts Avenue, NW  
Washington D.C. 20001  
Telephone: 202-344-4586  
Facsimile: 202-344-8300  
E-mail: [ajcurrie@venable.com](mailto:ajcurrie@venable.com)

*Counsel to the Official Ad Hoc Unitholders'  
Committee*