

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

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Ref. Docket Nos. 890, 1585, 1656

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
JOINDER AND STATEMENT IN SUPPORT OF DEBTORS' OBJECTION TO
MOTION TO QUASH OF CONTRARIAN FUNDS, LLC**

The Official Committee of Unsecured Creditors (the "Committee") appointed in the above-captioned cases, through the Committee's undersigned counsel, hereby joins and files this statement in support of the *Debtors' Objection to Motion to Quash of Contrarian Funds, LLC* [Docket No. 1656] (the "Objection").² The Committee joins in the Objection for the reasons set forth therein.

Background

1. On April 3, 2018, Contrarian Funds, LLC ("Contrarian") filed its *Motion for Authority to Acquire Promissory Notes* [D.I. 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 [D.I. 954] (the "Deposition Notice").

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 counsel for the Debtors.

² Capitalized terms not defined herein shall have the meaning as provided by the Objection.

3. In response, on April 18, 2018, Contrarian filed a *Motion to Quash of Contrarian Funds, LLC* [D.I. 1585] (the “Motion to Quash”) seeking to quash the Deposition Notice.

4. Contemporaneously therewith, Contrarian also filed its *Motion to Shorten Notice with Respect to Motion to Quash of Contrarian Funds, LLC* [D.I. 1586] (the “Motion to Shorten”) seeking to schedule the Motion to Quash to be heard during the previously scheduled omnibus hearing on May 1, 2018, at 11:00 a.m., and to shorten the period for notice of the hearing, with objections, if any, to be filed by 4:00 p.m. on April 26, 2018.

5. On April 19, 2018, the Debtors filed their Response to the Motion to Shorten and, among other things, consented to the Motion to Quash being heard on May 1, 2018 (as requested in the Motion to Shorten). On April 26, 2018, the Debtors filed the Objection.

Joinder

6. The Committee joins in the Objection and agrees that the Motion to Quash should be denied and that the Debtors be permitted to take the discovery requested with respect to the Notes Motion.

7. The Committee is committed to protecting the interests of investors who were defrauded by the Debtors’ former principal, Robert Shapiro. To this end, the Committee supported a moratorium on claims trading in order to ensure that investors are not prejudiced by unscrupulous claims traders who may be preying on investors.

8. For the reasons set forth in the Objection, the Committee believes that a full factual record must be developed before a hearing on the merits of the Notes Motion is conducted.

9. Accordingly, the Committee requests that the Court: (i) deny the Motion to Quash; (ii) permit the Debtors to take discovery concerning the Notes Motion; and (iii) grant such other and further relief as the Court deems appropriate.

Dated: April 30, 2018

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

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