

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

In re:	Chapter 11
WOODBIDGE GROUP OF COMPANIES LLC et al., <sup>1</sup>	Case No. 17-12560 (KJC)
Debtors.	(Jointly Administered)

**STATEMENT OF ARGO PARTNERS REGARDING  
(I) DEBTORS' OBJECTION TO PROOF OF CLAIM 1216;  
(II) CONTRARIAN FUNDS LLC'S RESPONSE THERETO; AND  
(III) MOTION OF CONTRARIAN FUNDS, LLC FOR AUTHORITY  
TO ACQUIRE PROMISSORY NOTES AGAINST THE DEBTORS**

Argo Partners II LLC ("Argo"), by and through its undersigned counsel, respectfully states as follows with respect to the (i) Debtors' Objection to Proof of Claim 1216 [Docket No. 1563] (the "Claim Objection") filed by the debtors and debtors in possession (the "Debtors"); (ii) the response of Contrarian Funds, LLC ("Contrarian") [Docket No. 1826] (the "Contrarian Response"); and (iii) Motion of Contrarian Funds, LLC for Authority to Acquire Promissory Notes Against the Debtors (the "Note Motion") [Docket No. 890], and respectfully represents:

1. Argo is an assignee of two claims against the Debtors: (i) proof of claim no. 1667, which is based on a promissory note executed by the Debtors (and contains an anti-assignment clause) and (ii) proof of claim no. 3619, which is a claim transferred by one of the Debtors' prior construction vendors. Argo files this statement in support of the Contrarian Response and to express its position with respect to the self-proclaimed temporary moratorium on consenting to any transfer Units or Notes (the "Moratorium").

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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. 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' noticing and claims agent at [www.gardencitygroup.com/cases/WGC](http://www.gardencitygroup.com/cases/WGC).

2. Argo has been in the business of purchasing claims against debtors in bankruptcy proceedings for over 25 years. Through that business, Argo seeks to make a reasonable profit by acquiring claims for an amount less than the amount that ultimately is distributed by the debtors' estates. Argo is entitled to make that profit because, in purchasing claims, it assumes substantial risks. Among others, Argo assumes the risk that, as is frequently the case, distributions from the bankruptcy estate will be delayed by a matter of months or years after the date of assignment. Argo also assumes the risk that distributions from the estate will be less than the amount that it paid for the claim.

3. Argo provides a valuable service to the often powerless holders of small claims. Argo provides such creditors with a way to "cash out" and move on with their lives, and to receive immediate, certain payment instead of waiting for some future distribution, in an uncertain amount and at an uncertain date. The benefits of having a claims trading market are well recognized and respected by Bankruptcy Courts because it provides liquidity to claimholders.<sup>2</sup>

4. Argo completely supports the notion of having a safe and fair distressed trading environment and is willing to work with the Debtors and the other estate representatives to develop protocols and procedures which will ensure that the "main street" Noteholder claimants are provided with timely information and sufficient disclosure to enable such claimants to make a fully informed decision in a competitive market.

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<sup>2</sup> See e.g., In re Biderman Indus. USA, Inc., 203 B.R. 547, 552 (Bankr. S.D.N.Y 1997) (Brozman, J.) ("There is, however, nothing inherently improper about purchasing claims at a discount. There is something to be said, in contrast, about the liquidity given to creditors through the existence of a secondary market for their claims."); In re SPM Mfg. Corp., 984 F.2d 1305, 1314 (1st Cir. 1993) ("Unsecured creditors often sell their claims to third parties, e.g., for 30 cents on the dollar, in order to avoid the uncertainty and delay of bankruptcy proceedings") citing, Chaim J. Fortgang & Thomas Moers Mayer, *Trading Claims and Taking Control of Corporations in Chapter 11*, 12 Cardozo L.Rev. 1, 2-3 (1990).

5. While it is an unfortunate reality, bankruptcy cases that contain “main street” or “retail” victims of fraudulent schemes is not a unique set of circumstances. In fact, Argo has participated in numerous other bankruptcy proceedings, insurance liquidations, and securities receiverships with “main street” claimants that were victims of a fraudulent scheme and contained a large number of small retail investors. *See, e.g., In re: American Business Financial Services, Inc., et al.*, Case No. 05-10203 (Bankr. D. Del. 2005) (claims based on “Senior Collateralized Subordinated Notes” held by retail investors that contained anti-assignment provisions); *In re: Metropolitan Mortgage & Securities Co., Inc., et al.*, Case No. 04-00757 (Bankr. E.D.Wash. 2004) (unsecured note and debenture claims held by more than 16,000 retail investors); *In re: Agway Inc., et al.*, Case No. 02-65872 (Bankr. N.D.N.Y. 2002) (claims based on “Subordinated Money Market Certificates” held by retail investors that contained anti-assignment provisions); *In re Vaughn Company Realtors*, Case No. 10-10759 (Bankr. D.N.M 2010) (claims based on unsecured promissory notes in a Ponzi scheme held by 600 retail investors).

6. However, what is unique about this case (and to Argo’s knowledge, has not been attempted before) is for a debtor/borrower to attempt to enforce a purported anti-assignment clause after the borrower has defaulted, for the sole basis of establishing a trading Moratorium on behalf of Noteholders. The Debtors have argued that establishing such a Moratorium is a sound exercise of the Debtor’s business judgment because of the unique nature of the Noteholders’ claims, the potential for unscrupulous methods by certain claims traders in acquiring such claims, and the potential for securities law violations. Argo supports and joins the arguments set forth in the Contrarian Response that the anti-assignment provisions contained in the Notes are not enforceable pursuant to applicable law and that the alleged securities law concerns are

inapplicable to the present facts. Moreover, the fact that the Debtors engaged in a Ponzi scheme does not justify the establishment of a trading Moratorium.<sup>3</sup>

7. The Ad Hoc Group of Noteholders has also asked this Court to take notice of the recent attempts to establish an alternative “borrowing facility” which they assert will provide Noteholders with liquidity at a lower cost to Noteholders (and, presumably to the estates) than what an efficient claims trading market would provide. As described in the *Statement of the Ad Hoc Noteholder Group Regarding (I) Debtors’ Objection to Proof of Claim 1216 and (II) Contrarian Funds LLC’s Response Thereto* [Docket 1900] (“Statement”), such a facility would be funded by “potential providers” and would contain a “market rate of interest” for what is essentially an unsecured, non-recourse loan. Statement at 9. The fact that such a borrowing facility is being contemplated does not justify the preclusion of an efficient claims trading market. While the terms of the borrowing facility has yet to be disclosed, if the “potential providers” are themselves profit making entities, then one would expect that such “market rate of interest” will contain a reasonable rate of return on investment - just as a distressed claims trader would seek a reasonable rate of return in setting its purchase price. As such, it is not inconceivable that both of these alternatives end up providing Noteholders with the same amount of liquidity at a similar cost. At the very least, these two alternatives are not mutually exclusive and may co-exist for the benefit of Noteholders.

8. Finally, Argo would like to reiterate that nothing in the Bankruptcy Code nor the Bankruptcy Rules provides authority to a Court, a debtor in possession, or an ad hoc group of

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<sup>3</sup> In addition to the cases cited in paragraph 5, the SIPA trustee for Bernard L. Madoff Investment Securities LLC (Adv. Pro. No. 08-01789 (BRL) - one of the largest Ponzi schemes in history - sought and established formal claims trading procedures to allow for orderly trading of allowed claims notwithstanding many of the potential “clawback” or setoff issues that are prevalent in Ponzi cases. See Order Granting Trustee’s Motion For An Order Establishing Procedures For The Assignment Of Allowed Claims [Docket No. 3138].

creditors to substitute their financial wisdom for the decisions of competent adults. The 1991 amendments to Rule 3001(e) of the Bankruptcy Rules eliminated the approval of claims transfers for precisely that reason. See In re SPM Mfg. Corp., 984 F.2d 1305, fn. 9 (1<sup>st</sup> Cir. 1993) (“under the amended rule, the bankruptcy court cannot disapprove the transfer because of its terms, e.g., inadequate consideration”). Any suggestion by the estates’ representatives that the purpose of the Moratorium is to protect Noteholders from their own desire to transfer a claim, should not be countenanced and is beyond the scope of authority of such parties to suggest otherwise.

Respectfully submitted,

Date: June 4, 2018

THE BIFFERATO FIRM, P.A.

/s/ Ian Connor Bifferato

Ian Connor Bifferato (#3273)  
1007 N. Orange St., 4<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 225-7600  
[cbifferato@tbf.legal](mailto:cbifferato@tbf.legal)

and

Gregory G. Plotko  
RICHARDS KIBBE & ORBE LLP  
200 Liberty Street  
New York, NY 10281  
(212) 530-1800  
[gplotko@rkollp.com](mailto:gplotko@rkollp.com)

*Counsel for Argo Partners II LLC*

**CERTIFICATE OF SERVICE**

I, Ian Connor Bifferato, hereby certify that on this 4<sup>th</sup> day of June, 2018, a copy of the foregoing *Statement of Argo Partners Regarding (I) Debtors' Objection to Proof of Claim 1216; (II) Contrarian Funds LLC's Response Thereto; and (III) Motion of Contrarian Funds, LLC for Authority to Acquire Promissory Notes Against The Debtors* was caused to be served on the attached service list via CM/ECF and first class mail.

*/s/ Ian Connor Bifferato* \_\_\_\_\_  
Ian Connor Bifferato (No. 3273)

Joseph N. Argentina, Jr. 222 Delaware Avenue Suite 1410 Wilmington, DE 19801	Paul S. Arrow William S. Brody Buchalter Nemer 1000 Wilshire Blvd. Suite 1500 Los Angeles, CA 9001-2457
Daniel K. Astin Joseph J. McMahon, Jr. John D. McLaughlin, Jr. Ciardi, Ciardi & Astin 1204 N. King Street Wilmington, DE 19801	David W. Baddley U.S. Securities & Exchange Commission 950 East Paces Ferry Road, N.E. Suite 900 Atlanta, GA 30326
Ian J Bambrick Sean Matthew Beach Donald J. Bowman, Jr. Betsy Lee Feldman Young Conaway Stargatt & Taylor, LLP 1000 North King Street Wilmington, DE 19801	Peter John Barrett Kutak Rock LLP 901 East Byrd Street Suite 1000 Richmond, VA 23219-4071
William Pierce Bowden Ashby & Geddes 500 Delaware Avenue 8th Floor, P.O. Box 1150 Wilmington, DE 19899	Karen C. Bifferato Kelly M. Conlan Connolly Gallagher LLP The Brandywine Building 1000 West Street, Suite 1400 Wilmington, DE 19801
Stuart M. Brown DLA Piper LLP (US) 1201 North Market Street Suite 2100 Wilmington, DE 19801	Charles J. Brown Margaret Fleming England Gellert Scali Busenkell & Brown LLC 1201 N. Orange Street Suite 300 Wilmington, DE 19801
Timothy R. Casey Drinker Biddle & Reath LLP 191 N. Wacker Drive Suite 3700 Chicago, IL 60606	Kate R. Buck McCarter & English, LLP 405 N. King Street, 8th Floor Wilmington, DE 19801
Debra J Cohen Halperin Battaglia Raicht LLP 40 Wall Street 37 Floor New York, NY 10005	William E. Chipman, Jr. Chipman Brown Cicero & Cole, LLP Hercules Plaza 1313 North Market Street Suite 5400 Wilmington, DE 19801

Jennifer L. Conn Gibson Dunn & Crutcher LLP 200 Park Avenue New York, NY 10166-0193	Tom H. Connolly Connolly & Lofstedt, PC 950 Spruce Street Suite 1C Louisville, CO 80027
Andrew J Currie Venable LLP 750 East Pratt Street, Suite 900 Baltimore, MD 21202	Joshua A. del Castillo Allen Matkins Leck Gamble Mallory Natsis 865 S. Figueroa Street Los Angeles, CA 90017-2543
Christopher Michael De Lillo Richards, Layton & Finger, P. A. One Rodney Square 920 North King Street Wilmington, DE 19801	Daniel B. Denny Samuel A. Newman Gibson Dunn & Crutcher LLP 333 South Grand Avenue 47th Floor Los Angeles, CA 90071
Mark L. Desgrosseilliers Womble Bond Dickinson (US) LLP 222 Delaware Avenue Suite 1501 Wilmington, DE 19801	Emily Kathryn Devan Reed Smith LLP 1201 Market Street 15th Floor Wilmington, DE 19801
Paul T. Dye Reiter Dye & Brennan, LLP 10990 Wilshire Boulevard Suite 940 Los Angeles, CA 90024	Jamie Lynne Edmonson Daniel A. O'Brien Venable LLP 1201 North Market Street Suite 1400 Wilmington, DE 19801
Angela Ferrante The Garden City Group, Inc. 1985 Marcus Avenue Suite 200 Lake Success, NY 11042	William W. Erhart William W. Erhart, P.A. 800 King Street Suite 303 Wilmington, DE 19801
James Michael Feuille ScottHulse PC 1100 Chase Tower 201 E. Main El Paso, TX 79901	David A. Fidler Klee, Tuchin, Bogdanoff & Stern, LLP 1999 Avenue of the Stars Thirty Ninth Floor Los Angeles, CA 90067
Timothy Jay Fox, Jr. Office of the United States Trustee U. S. Department of Justice 844 King Street, Suite 2207 Lockbox #35 Wilmington, DE 19801	Elise S Frejka Frejka PLLC 420 Lexington Avenue - Suite 310 New York, NY 10170



<p>Aaron A. Garber Buechler &amp; Garber, LLC 999 18th Street Denver, CO 80202</p>	<p>Oscar Garza Gibson Dunn &amp; Crutcher LLP 3161 Michelson Drive Irvine, CA 92612</p>
<p>Gavin C Gaukroger Berger Singerman LLP 350 East Las Olas Boulevard 10th Floor Fort Lauderdale, FL 33301</p>	<p>Stephen Brett L. Katherine Good Gerald Whiteford Taylor Preston LLC The Renaissance Centre, Suite 500 405 North King Street Wilmington, DE 19801</p>
<p>Elan Gershoni Ryan O'Quinn DLA Piper LLP 200 S. Biscayne Boulevard Suite 2500 Miami, FL 33131</p>	<p>Phillip Guffy Kramer Levin Naftalis Frankel LLP 1177 Avenue of the Americas New York, NY 10036</p>
<p>Kevin A. Guerke Baird Mandalas Brockstedt, LLC 2961 Centerville Road, Suite 310 Wilmington, DE 19808</p>	<p>Lee B. Gordon McCreary, Veselka, Bragg &amp; Allen, P.C. P.O. Box 1269 Round Rock, TX 78680</p>
<p>Aaron Gober-Sims Winston &amp; Strawn LLP 333 S. Grand Avenue 38th Floor Los Angeles, CA 90071-1543</p>	<p>Eric Goldberg DLA Piper LLP 2000 Avenue of the Stars Suite 400 North Tower Los Angeles, CA 90067-4704</p>
<p>Kurt F. Gwynne Reed Smith LLP 1201 Market Street 15th Floor Wilmington, DE 19801</p>	<p>Jason A. Gibson The Rosner Law Group LLC 824 Market Street, Suite 810 Wilmington, DE 19801</p>
<p>James E. Huggett Margolis Edelstein 300 Delaware Ave. Suite 800 Wilmington, DE 19801</p>	<p>Justin R. Infurna The Infurna Law Firm, PA 121 South Orange Avenue Suite 1500 Orlando, FL 32801</p>
<p>James Andrew Hinds, Jr. Hinds &amp; Shankman LLP 21257 Hawthorne Blvd. 2nd Floor Torrance, CA 90503</p>	<p>Whitman L. Holt Klee, Tuchin, Bogdanoff &amp; Stern LLP 1999 Avenue of the Stars 39th Floor Los Angeles, CA 90067</p>

<p>Steve H. Mazer 2501 Yale Blv'd. SE Ste 204 Albuquerque, NM 87016</p>	<p>Curtis A Hehn Law Office of Curtis A. Hehn 1000 N. West Street, Suite 1200 Wilmington, DE 19801</p>
<p>William A. Hazeltine Sullivan Hazeltine Allinson LLC 901 North Market Street Suite 1300 Wilmington, DE 19801</p>	<p>Alan D. Halperin Halperin Battaglia Benzija, LLP 40 Wall Street - 37th Floor New York, NY 10005</p>
<p>Neal Ralph Jacobson US Securities and Exchange Commission Seven World Trade Center New York, NY 10281</p>	<p>Nina M. LaFleur LaFleur Law Firm P.O. Box 840158 St. Augustine, FL 32080</p>
<p>Russell Koonin US Securities and Exchange Commission 801 Brickell Avenue Miami, FL 33131</p>	<p>John Henry Knight Richards, Layton &amp; Finger, P.A. One Rodney Square P.O. Box 551 Wilmington, DE 19899</p>
<p>Kenneth N. Klee Klee Tuchin Bogdanoff Stern LLP 1999 Avenue of the Stars Thirty-Ninth Floor Los Angeles, CA 90067</p>	<p>David M. Klauder Bielli &amp; Klauder, LLC 1204 N. King Street Wilmington, DE 19801</p>
<p>Samuel M. Kidder Klee, Tuchin, Bogdanoff &amp; Stern LLP 1999 Avenue of the Stars Thirty-Ninth Floor Los Angeles, CA 90067</p>	<p>Matthew K. Kelsey J. Eric Wise Gibson, Dunn &amp; Crutcher LLP 200 Park Avenue New York, NY 10166</p>
<p>Christopher A Jones Whiteford Taylor Preston LLP 3190 Fairview Park Drive Suite 300 Falls Church, VA 22042</p>	<p>Richard Levy, Jr. Pryor Cashman LLP 7 Times Square New York, NY 10036</p>
<p>Rachel B. Mersky Monzack Mersky McLaughlin &amp; Browder, PA 1201 N. Orange Street, Suite 400 Wilmington, DE 19801</p>	<p>Christopher Dean Loizides Loizides, P.A. 1225 King Street Suite 800 Wilmington, DE 19801</p>

<p>Isaac Marcushamer Berger Singerman LLP 1450 Brickell Avenue Suite 1900 Miami, FL 33131</p>	<p>David Neier Winston &amp; Strawn LLP 200 Park Avenue New York, NY 10166-4193</p>
<p>Seth H. Lieberman Pryor Cashman LLP 7 Times Square New York, NY 10036</p>	<p>Charles H. Lichtman Berger Singerman 350 East Las Olas Boulevard Suite 1000 Fort Lauderdale, FL 33301</p>
<p>David L Mortensen Stoel Rives LLP 201 S. Main Street, #1100 Salt Lake City, UT 84111</p>	<p>John A. Morris Pachulski Stang Ziehl &amp; Jones LLP 780 Third Ave, 36th floor New York, NY 10017</p>
<p>John D. Monte 15303 Ventura Boulevard Floor 9 Sherman Oaks, CA 91403</p>	<p>Blake D. Miller Jones Waldo Holbrook &amp; McDonough, PC 170 S. Main Street Suite 1500 Salt Lake City, UT 84101</p>
<p>Christine Nestor US Securities and Exchange Commission 801 Brickell Avenue Suite 1800 Miami, FL 33131</p>	<p>Paul J. Pascuzzi Felderstein Fitzgerald Willoughby &amp; Pascuzzi LLP 400 Capitol Mall, Suite 1750 Sacramento, CA 95814-4434</p>
<p>P. Bradley O'Neill Kramer Levin Naftalis &amp; Frankel LLP 1177 Avenue of the Americas New York, NY 1003</p>	<p>Ryan C. Reinert Shutts &amp; Bowen LLP 4301 W. Boy Scout Blvd., Suite 300 Tampa, FL 33607</p>
<p>Kenny Khoa Vu Nguyen California Department of Business Oversight 1515 K Street, Suite 200 Sacramento, CA 95814</p>	<p>Matthew P. Porcelli Gisbon Dunn &amp; Crutcher LLP 200 Park Avenue New York, NY 10166-0193</p>
<p>Eloy Antonio Peral Wilk Auslander LLP 1515 Broadway, 43rd Floor New York, NY 10036</p>	<p>Robert J. Pfister Klee, Tuchin, Bogdanoff &amp; Stern LLP 1999 Avenue of the Stars 39th Floor Los Angeles, CA 90067</p>

<p>James C. Reed James C. Reed, P.A. 6 Century Plaza 19633 Blue Bird Lane, Suite 6 Rehoboth Beach, DE 19971-6130</p>	<p>Harry Jay Ross Law Office of Harry J Ross 6100 Glades Road Suite 211 Boca Raton, FL 33434</p>
<p>Michael P. Pompeo Drinker Biddle &amp; Reath LLP 1177 Avenue of the Americas, 41st Floor New York, NY 10036</p>	<p>Frederick Brian Rosner The Rosner Law Group LLC 824 Market Street, Suite 810 Wilmington, DE 19801</p>
<p>Marc J. Phillips Manning Gross + Massenburg LLP 1007 North Orange Street 10th Floor Wilmington, DE 19801</p>	<p>Jorian Rose Baker &amp; Hostetler LLP 45 Rockefeller Plaza New York, NY 10111</p>
<p>Jeffrey W. Reisner Irell &amp; Manella LLP 840 Newport Center Drive Suite 400 Newport Beach, CA 92660</p>	<p>John B. Robins, IV Robins &amp; Robins, P.A. 128 East Main Street Salisbury, MD 21801</p>
<p>Colin Robinson Bradford J. Sandler Pachulski Stang Ziehl &amp; Jones LLP 919 North Market Street 17th Floor Wilmington, DE 19801</p>	<p>Joseph E Sarachek 101 Park Avenue 27th Floor New York, NY 10178</p>
<p>Genise Reiter Reiter Dye &amp; Brennan, LLP 10990 Wilshire Boulevard Suite 940 Los Angeles, CA 90024</p>	<p>Andrew R. Remming Morris, Nichols, Arsht &amp; Tunnell LLP 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899-1347</p>
<p>Jeffrey S. Sabin Carol Weiner-Levy Venable LLP 1270 Avenue of the Americas New York, NY 10020</p>	<p>Mark Shinderman Milbank, Tweed, Hadley &amp; McCloy LLP 601 South Figueroa Street 30th Floor Los Angeles, CA 90017</p>
<p>Matthew Silverman Arizona Attorney General's Office Bankruptcy &amp; Collection Section 2005 North Central Avenue Phoenix, AZ 85004</p>	<p>Jeffrey W. Shields Jones Waldo 170 South Main, Suite 1500 Salt Lake City, UT 84101</p>

Jennifer M. Schank Krekeler Strother, SC 2901 W. Beltline Highway Suite 301 Madison, WI 53713	Courtney A. Schael ASHFORD SCHAEEL LLC 100 Quimby Street Suite 1 Westfield, NJ 07090
Matthew W. Silverman Pryor Cashman LLP 7 Times Square New York, NY 10036	Michael H. Strub, Jr. Irell & Manella LLP 840 Newport Center Drive Suite 400 Newport Beach, CA 92660-6324
David M. Stern Klee Tuchin Bogdanoff & Stern LLP 1999 Avenue of the Stars 39th Floor Los Angeles, CA 90067	Jonathan M. Stemerman Elliott Greenleaf, PC 1105 North Market Street Suite 1700 Wilmington, DE 19801
Richard M. Pachulski James I. Stang Jeffrey N. Pomerantz Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Blvd. 11th Floor Los Angeles, CA 90067	Eric J. Snyder Wilk Auslander LLP 1515 Broadway, 43rd Floor New York, NY 10036
Paul R. Smith Jones Waldo Holbrook & McDonough, PC 170 S. Main Street Suite 1500 Salt Lake City, UT 84101	Paul Steven Singerman Berger Singerman 1450 Brickell Avenue Suite 1900 Miami, FL 33131
Eric Michael Suttly Elliott Greenleaf 1105 Market Street, Suite 1700 Wilmington, De 19801	William E Winfield Schneiders & Associates LLP 300 E. Esplanade Drive Suite 1980 Oxnard, CA 93036
Jonathan M Weiss Klee, Tuchin, Bogdanoff & Stern LLP 1999 Avenue of the Stars 39th Floor Los Angeles, CA 90067	David R. Zaro Allen Matkins Leck Gamble Mallory Natsis 865 S. Figueroa Street Suite 2800 Los Angeles, CA 90017-2543
Andrew Warner c/o United States Department of Justice 1100 L Street, NW Washington, DC 20005	Michael L. Tuchin Klee, Tuchin, Bogdanoff & Stern, LLP 1999 Avenue of the Stars 39th Floor Los Angeles, CA 90067

James Tobia The Law Office of James Tobia, LLC 1716 Wawaset Street Wilmington, DE 19806	Alan G Tippie SulmeyerKupetz 333 South Hope Street 35th Floor Los Angeles, CA 90071
Stuart A. Young Young, Brooks, & Pefka, P.A. 1860 Forest Hill Blvd., Suite 201 West Palm Beach, FL 33406	Risa Lynn Wolf-Smith Holland & Hart LLP 555 Seventeenth Street Suite 3200 Denver, CO 80201
Rafael X. Zahralddin Elliott Greenleaf PC 1105 N. Market Street Suite 1700 Wilmington, DE 19801	Gregory W. Hauswirth Leech Tishman 1000 N. West Street, Suite 1200 Wilmington, DE 19801