

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

In re:

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

Remaining Debtors.

---

MICHAEL GOLDBERG, as Liquidating Trustee of  
the Woodbridge Liquidation Trust, successor in  
interest to the estates of WOODBRIDGE GROUP  
OF COMPANIES, LLC, *et al.*,

Plaintiff,

v.

KIRK T. GRIFFITH; MAINSTAR TRUST,  
CUSTODIAN FOR THE BENEFIT OF KIRK  
GRIFFITH TW003085,

Defendants.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adv. Proc. No. 19-50899 (BLS)

---

**CERTIFICATION OF COUNSEL REGARDING STIPULATION  
FOR JUDGMENT AGAINST KIRK T. GRIFFITH**

---

The undersigned hereby certifies as follows:

1. On November 25, 2019, plaintiff Michael Goldberg (the "Plaintiff"), in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust, filed the *Complaint Objecting to Claims and Counterclaiming for Avoidance and Recovery of Avoidable Transfers, for Equitable Subordination, for Sale of Unregistered Securities, Fraud, and for Aiding and Abetting Fraud* (the "Complaint") with the U.S. Bankruptcy Court for the District of Delaware

---

<sup>1</sup> The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors' mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

(the “Court”) against defendants Kirk T. Griffith (“Griffith”) and Mainstar Trust, custodian for the benefit of Kirk Griffith TW003085, (each a “Defendant,” and collectively, the “Defendants”).

2. On November 25, 2019, the Plaintiff filed summons [Adv. Docket No. 2] which was served along with the Complaint upon each Defendant.

3. The Plaintiff and the Defendant Griffith have entered into a *Stipulation for Judgment Against Kirk T. Griffith* (the “Stipulation”) which establishes the judgment amount against Defendant Griffith. The Stipulation is attached hereto as **Exhibit A**.

4. A proposed form of order (“Proposed Order”) approving the Stipulation is attached thereto as Exhibit 1. A proposed form of judgment (the “Judgment”) is attached to the Stipulation as Exhibit 2.

5. Accordingly, the Plaintiff respectfully requests that this Court enter Proposed Order and Judgment.

Dated: November 5, 2020  
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ Colin R. Robinson*

Richard M. Pachulski (CA Bar No. 90073)

Andrew W. Caine (CA Bar No. 110345)

Bradford J. Sandler (DE Bar No. 4142)

Colin R. Robinson (DE Bar No. 5524)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899 (Courier 19801)

Telephone: 302-652-4100

Fax: 302-652-4400

Email: rpachulski@pszjlaw.com

acaine@pszjlaw.com

bsandler@pszjlaw.com

crobinson@pszjlaw.com

*Counsel to the Woodbridge Liquidation Trust*

**EXHIBIT A**

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>  
Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of  
the Woodbridge Liquidation Trust, successor in  
interest to the estates of WOODBRIDGE GROUP  
OF COMPANIES, LLC, *et al.*,

Plaintiff,

v.

KIRK T. GRIFFITH; MAINSTAR TRUST,  
CUSTODIAN FOR THE BENEFIT OF KIRK  
GRIFFITH TW003085,

Defendants.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adv. Proc. No. 19-50899 (BLS)

**STIPULATION FOR JUDGMENT  
AGAINST KIRK T. GRIFFITH**

This *Stipulation for Judgment Against Kirk T. Griffith* (“Stipulation”) is entered into between the following parties (collectively, the “Parties”) to the above-captioned adversary proceeding (the “Adversary Proceeding”): Plaintiff Michael Goldberg, as Liquidating Trustee of the Woodbridge Liquidation Trust, (the “Trustee”), and Defendant Kirk T. Griffith ( “Griffith” or “Defendant”).

<sup>1</sup> The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

**RECITALS**

WHEREAS, Plaintiff is the duly appointed trustee of the Woodbridge Liquidation Trust (the "Trust"), successor in interest to the Debtors. Pursuant to Paragraph 5.4 of the Plan, and Article IV of the Liquidating Trust Agreement, the Trustee has the sole authority to pursue and resolve claims transferred to the Trust by the Debtors through the Plan and to seek any and all related relief.

WHEREAS, the Defendant is an individual who resides in Mohnton, Pennsylvania, and Defendant formerly sold note and unit investments in the Debtors to their clients.

WHEREAS, the Trustee has asserted, among other things, (a) a claim against Defendant, to avoid and recover alleged fraudulent and/or preferential transfers totaling \$19,212.00 (the "Transfers"); and (b) that claim number 6506 and scheduled claim ID 1010348 (the "Claims") be disallowed, stricken from the claims register and that Defendant takes nothing therefrom.

WHEREAS, the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") has jurisdiction over this adversary proceeding under the Bankruptcy Code pursuant to 28 U.S.C. §§ 157(a) and 1334(a).

WHEREAS this proceeding is a core proceeding within the meaning of 28 U.S.C. § 157(b) and the Bankruptcy Court may enter final orders for the matters contained herein.

WHEREAS, venue in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409(a).

WHEREAS, the Trustee and Defendant have agreed that the Trustee be granted a judgment against the Defendant in the amount of \$426,178.31 and for disallowance of the Claims.

NOW, THEREFORE, it is hereby stipulated by the Parties that:

1. The Parties request that the Court enter the Order attached hereto as **Exhibit 1** to approve this Stipulation and issue the Judgment attached hereto as **Exhibit 2** in favor of the Trustee in the amount of \$426,178.31 and for disallowance of the Claims.

2. Notices provided herein shall be sent to Defendant by email or U.S. mail, to the following address:

Eden R. Bucher, Esq.  
Leisawitz Heller  
2755 Century Blvd.  
Wyomissing, PA 19610  
Email: ebucher@leisawitzheller.com

3. The Trustee is authorized and entitled to file this Stipulation in the Bankruptcy Court and seek entry of the Order and Judgment.

4. Except as provided in this Stipulation, the Parties waive their rights to (a) any trial (jury or otherwise), (b) appeal or (c) otherwise attempt to set aside or attack the Stipulation, the Order or the Judgment, and agree that the Judgment may be entered pursuant to this Stipulation.

5. The Trustee may execute on the Judgment (once entered) after providing three (3) days notice by e-mail to the person listed in paragraph 2 above.

6. The Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from or related to the Stipulation, any order of the Bankruptcy Court approving the Stipulation, and/or any judgment entered by the Bankruptcy Court in connection with the Stipulation.

7. The Parties acknowledge that they have each carefully read and understood this Stipulation in its entirety, and have had the opportunity to seek advice from legal counsel of their own choosing prior to executing the Stipulation.

8. Each signatory represents and warrants that he is authorized to execute this Stipulation.

9. This Stipulation may be executed in any number of counterparts, each of which when so executed shall be deemed to be an original and all of which taken together shall constitute one and the same Stipulation. Delivery of a signature page to this Stipulation by facsimile or other electronic means shall be effective as delivery of the original signature page to this Stipulation.

WHEREFORE, the Parties have executed this Stipulation on the dates shown below.

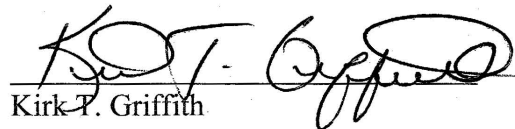
Dated: 10/29, 2020

Dated: 10/27, 2020

WOODBIDGE GROUP OF  
COMPANIES, LLC, *et al.*



\_\_\_\_\_  
Michael Goldberg  
Liquidating Trustee of the Woodbridge  
Liquidation Trust

  
Kirk T. Griffith

*Signatures Continued on Following Page*

APPROVED AS TO FORM:

Dated: Nov. 5, 2020

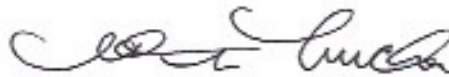
PACHULSKI STANG ZIEHL & JONES LLP



---

Bradford J. Sandler (DE Bar No. 4142)  
Andrew W. Caine (CA Bar No. 110345)  
Colin R. Robinson (DE Bar No. 5524)  
PACHULSKI, STANG, ZIEHL & JONES LLP  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, DE 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: bsandler@pszjlaw.com  
acaine@pszjlaw.com  
crobinson@pszjlaw.com

LEISAWITZ HELLER



---

Edén R. Bucher, Esq.  
Leisawitz Heller  
2755 Century Blvd.  
Wyomissing, PA 19610  
Telephone: (610) 372-3500  
Facsimile: (610) 372-8671  
Email: ebucher@leisawitzheller.com



**EXHIBIT 1**

(Agreed-Upon Order Approving Stipulation)

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>2</sup>  
Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of  
the Woodbridge Liquidation Trust, successor in  
interest to the estates of WOODBRIDGE GROUP  
OF COMPANIES, LLC, *et al.*,

Plaintiff,

v.

KIRK T. GRIFFITH; MAINSTAR TRUST,  
CUSTODIAN FOR THE BENEFIT OF KIRK  
GRIFFITH TW003085,

Defendants.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adv. Proc. No. 19-50899 (BLS)

**ORDER APPROVING STIPULATION FOR JUDGMENT  
AGAINST KIRK T. GRIFFITH**

The Court having considered the *Stipulation for Judgment Against Kirk T. Griffith* (the “Stipulation”) and the evidence presented in connection with the Stipulation, and good cause appearing therefor, it is hereby

ORDERED that the Stipulation is approved; and it is further

ORDERED that judgment (“Judgment”) shall be entered against defendant Kirk T. Griffith (the “Defendant”), and in favor of Michael Goldberg, as Liquidating Trustee of the Woodbridge Liquidation Trust, (the “Trustee”) in the amount of \$426,178.31, that claim

<sup>2</sup> The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

number 6506 and scheduled claim ID 1010348 be disallowed, stricken from the claims register and that Defendant take nothing therefrom; and it is further

ORDERED that the Defendant and the Trustee each have waived their respective rights to (a) any trial (jury or otherwise), (b) appeal or (c) otherwise attempt to set aside or attack the Stipulation, this Order or the Judgment, and have agreed that the Judgment may be entered pursuant to the Stipulation and this Order; and it is further

ORDERED, that the Trustee may execute on the Judgment after providing three (3) days notice by e-mail to the person listed in paragraph 2 of the Stipulation for Judgment Against Kirk T. Griffith.

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the Stipulation, this Order and/or the Judgment.

**EXHIBIT 2**

(Agreed-Upon Judgment)

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>  
Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of  
the Woodbridge Liquidation Trust, successor in  
interest to the estates of WOODBRIDGE GROUP  
OF COMPANIES, LLC, *et al.*,

Plaintiff,

v.

KIRK T. GRIFFITH; MAINSTAR TRUST,  
CUSTODIAN FOR THE BENEFIT OF KIRK  
GRIFFITH TW003085,

Defendants.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adv. Proc. No. 19-50899 (BLS)

**JUDGMENT PURSUANT TO STIPULATION OF JUDGMENT  
AGAINST KIRK T. GRIFFITH**

In accordance with the *Order Approving Stipulation for Judgment Against Kirk T. Griffith* (the “Order”) and Plaintiff having moved to enter Judgment pursuant to the Stipulation For Judgment, and good cause appearing therefor,

IT IS HEREBY ORDERED AND ADJUDGED THAT:

1. Judgment is entered in favor of Michael Goldberg, as Liquidating Trustee of the Woodbridge Liquidation Trust, against Defendant Kirk T. Griffith in the amount of \$426,178.31 (the “Principal Amount”) and for the disallowance of claim number

<sup>1</sup> The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

6506 and scheduled claim ID 1010348, which shall be stricken from the claims register in these cases.

2. Post-judgment interest at the federal judgment rate shall accrue on the Principal Amount from the date of entry of this Judgment.
3. The Court retains jurisdiction to hear and determine all matters arising from or related to the Order and/or this Judgment.