

**FILED**

**2020 AUG 25 AM 8:00**

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

**CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

MICHAEL GOLDBERG, in his capacity as	)	
Liquidating trustee of the WOODBRIDGE	)	
LIQUIDATION TRUST	)	
Plaintiff,	)	
	)	Adversary Proceeding
vs.	)	Case No. 19-51071 (BLS)
	)	
EDUARDO G. DIAZ and DIAZ RETIREMENT	)	
CONSULTANT	)	
Defendant	)	

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The Defendant, Eduardo G. Diaz and Diaz Retirement Consultant respectfully submits the following request for a 30-day extension to this Honorable Court and to the Liquidating Trustee of the WOODBRIDGE LIQUIDATING TRUST, MICHAEL GOLDBERG.

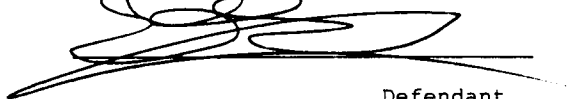
**REQUEST FOR 60 DAY EXTENSION**

The following 30-day request by the Defendant is needed for the following reasons:

1. The Defendant is recently in possession of this Adversary Motion by the Trustee of the WOODBRIDGE LIQUIDATION TRUST allowing not enough time to assemble the necessary documentation needed for a proper response.
2. The Defendant has made a request to third parties for documentation that is needed to properly respond to the court and have not received in return the documentation requested.
3. The Defendant just recently received documentation in his control that was in storage and has not had the appropriate time to review all the files that may be needed to respond to the Trustee's motion.
4. The collection of all documentation and therefore the necessary time needed to review all documents, in control of the Defendant and third-parties, has been affected by the Covid-19 pandemic.
5. The extension is needed for the defendant to properly file the appropriate forms required by the Court NECESSARY FOR THE Defendant to proceed pro se.

6. On Friday August 21, 2020, at 8:20AM Central Time, the Defendant called the Plaintiff's attorney Bradford J. Sandler of Pachulski Stang Ziehle & Jones LLP to request an extension. The Defendant left a message as instructed on his voice mail with his name, telephone number, and his request. The Defendant's called was not returned.

Date: August 21, 2020



Defendant