IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
WOODBRIDGE GROUP OF COMPANIES, LLC, <i>et al.</i> , ¹	Case No. 17-12560 (BLS)
Remaining Debtors.	(Jointly Administered)
MICHAEL GOLDBERG, in his capacity as Liquidating Trustee of the WOODBRIDGE LIQUIDATION TRUST,	Adversary Proceeding
Plaintiff, vs.	Case No. 19-51029 (BLS)
SAFETY OF PRINCIPLE, INC.,	

STIPULATION REGARDING APPOINTMENT OF MEDIATOR

Pursuant to this Court's September 3, 2020, scheduling order (the "Scheduling

Order"), plaintiff, Michael Goldberg, in his capacity as Liquidating Trustee of the Woodbridge

Liquidation Trust, and defendant Safety Of Principle, Inc., stipulate as follows:

Defendant.

1. Derek C. Abbott, Esquire, of Morris, Nichols, Arsht & Tunnell LLP shall

be appointed as the mediator (the "Mediator") in this adversary proceeding.

2. The mediation between the parties shall proceed in accordance with the

Scheduling Order and the deadlines set forth therein and shall be conducted in accordance with

the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for

¹ 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 District of Delaware and/or otherwise as may be agreed by the parties and the Mediator. The

parties will select a date for commencement of the mediation.

STIPULATED AND AGREED:

Dated: November 23, 2020

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Bradford J. Sandler (DE Bar No. 4142) Andrew W. Caine (CA Bar No. 110345) Colin R. Robinson (DE Bar No. 5524) 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 /s/ Kenneth S. Feyers

Safety of Principle, Inc. Attn: Kenneth S. Feyers 12082 NW 30th Street Coral Springs, FL 33065

Pro Se Defendant

Counsel to Plaintiff