

**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)

NOTICE OF RULE 30(b)(6) DEPOSITION OF SYCAMORE GROUP INC.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure (“FRCP”), made applicable herein by Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the debtors and debtors in possession (the “Debtors”) in the above-captioned chapter 11 bankruptcy case will take a deposition of Sycamore Group Inc.

(“Sycamore”) on August 28, 2018, commencing at 9:00 a.m., at 5401 S. Kirkman Road, Suite 310, Orlando, Florida 32819, or at such other time or place as the Court may specify or the parties may mutually agree.

PLEASE TAKE FURTHER NOTICE that the deposition will be taken before an officer authorized to administer oaths, all testimony will be recorded by stenographic means, LiveNote may be used, and the deposition may also be recorded by audiovisual means.

PLEASE TAKE FURTHER NOTICE that “the matters for examination,” FRCP 30(b)(6), concern the matters relevant to the proofs of claim filed by Sycamore in the above-captioned

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 this information may be obtained on the website of the Debtors’ noticing and claims agent at www.gardencitygroup.com/cases/WGC, or by contacting the undersigned counsel for the Debtors.

chapter 11 bankruptcy case, bearing Proof of Claim Nos. 67, 9589, and 9590 (collectively, the “Sycamore Claims”), specifically including:

- (1) The factual basis, if any, supporting Sycamore’s entitlement to the claim amounts set forth in the Sycamore Claims.
- (2) Any contracts, agreements, and other documents of any type concerning the terms and conditions of any commissions, salary, wages, reimbursement, or compensation of any type payable by the Debtors to Sycamore.
- (3) Any contracts or agreements entered into by (i) Sycamore or any affiliate of Sycamore, on the one hand, and (ii) any one or more of the Debtors or any affiliate of the Debtors, on the other hand, including, without limitation, any employment agreements or independent contractor agreements.
- (4) Any licenses, certificates, registrations, or credentials held by Sycamore or any of its affiliates relating to the sale of securities, real estate, or any investment product.
- (5) Any payments, reimbursements, transfers, or compensation received by Sycamore or any of its affiliates from the Debtors or any affiliate of the Debtors.

PLEASE TAKE FURTHER NOTICE that, pursuant to FRCP 30(b)(6), Sycamore must “designate one or more officers, directors, or managing agents, or . . . other persons who consent to testify” on behalf of Sycamore regarding “information known or reasonably available to” Sycamore with respect to the preceding matters.

Dated: July 18, 2018
Wilmington, Delaware

/s/ Ian J. Bambrick
YOUNG CONAWAY STARGATT & TAYLOR, LLP
Sean M. Beach (No. 4070)
Edmon L. Morton (No. 3856)
Michael S. Neiburg (No. 5275)
Ian J. Bambrick (No. 5455)
Rodney Square, 1000 North King Street
Wilmington, Delaware 19801
Tel: (302) 571-6600
Fax: (302) 571-1253

-and-

KLEE, TUCHIN, BOGDANOFF & STERN LLP
Kenneth N. Klee (*pro hac vice*)
Michael L. Tuchin (*pro hac vice*)
David A. Fidler (*pro hac vice*)
Jonathan M. Weiss (*pro hac vice*)
1999 Avenue of the Stars, 39th Floor
Los Angeles, California 90067

Counsel to the Debtors and Debtors in Possession