

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

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of
the Woodbridge Liquidation Trust, successor in
interest to the estate of Woodbridge Group of
Companies, LLC, *et al.*,

Plaintiff,

v.

[SEE ATTACHED **EXHIBIT A**],

Defendants.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding

Case Nos. (See attached **Exhibit A**)

CERTIFICATION OF COUNSEL REGARDING SCHEDULING ORDER

The undersigned hereby certifies the following:

1. Michael Goldberg, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estate of Woodbridge Group of Companies, LLC, *et al.*, (the “Plaintiff”) filed complaints (the “Complaints”) with the United States Bankruptcy Court for the District of Delaware (the “Court”) against the above-captioned defendants (the “Defendants,” and together with the Plaintiff, the “Parties”).

2. The above-captioned Defendants have filed answers and/or other

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 Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

responsive pleadings to the Complaints and the Plaintiff has circulated to the Defendants a proposed form of scheduling order (the “Scheduling Order”) attached hereto as **Exhibit 1**.

3. The Trust has conferred with the Defendants listed on **Exhibit B** hereto and those Defendants have agreed upon the Scheduling Order.

4. Following the hearing before the Court on August 12, 2020 (the “Hearing”), and as described on the record at the Hearing by counsel to the Trustee, counsel for the Trustee again contacted the Defendants listed on **Exhibit C** who failed to respond to the initial request to review the proposed scheduling order. No response was received to the follow-up communication.

5. The Plaintiff hereby requests entry of the Scheduling Order attached hereto as Exhibit 1 at the Court’s convenience.

Dated: September 2, 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 Plaintiff